

**APPENDIX F**  
**OTHER SCOPING COMMENTS**

Phil Youngberg  
c/o John Dugan  
General Services Administration  
10 Causeway St. Room 925  
Boston, Mass. 02222

March 21, 2010

Dear Mr. Dugan,

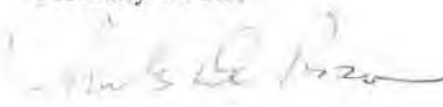
I read the article on Plum Island in the March 21 edition of Long Island Newsday and would like to make a suggestion for the use of Plum Island. I have written to several State officials but have never received a response.

I believe that Plum Island is an ideal location for a wind farm or solar energy installation. The wind farm could appease the environmentalist that are opposed to installations along the Long Island coast. I believe an installation on land would greatly improve the cost of such an installation and also provide less expensive security and maintenance.

We are in great need of renewable energy and this seems to be an ideal use for this piece of property.

Thank you for your attention. I would be interested in any comments you have regarding this idea or if there are any legalities that may prevent such a development.

Cordially Yours,



Charles DeRosa  
7 Philip Lane  
Middle Island, NY 11953

## Haywood, Paul

---

**From:** phil.youngberg@gsa.gov  
**Sent:** Friday, May 21, 2010 12:15 PM  
**To:** jas kell  
**Cc:** Jenkins, Josh; Stelmack, Mark; John Dugan  
**Subject:** Re: plum island

Thank you for your comments. They will be included in the project record and will be considered.

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**From:** jas kell [jkell12001@yahoo.com]  
**Sent:** 05/21/2010 04:42 AM MST  
**To:** Philip Youngberg  
**Subject:** plum island

i sincerely think ,that to keep down any misgivings about the island, that it should be turned into a wildlife refuge for endangered species and other animals.  
the fears that there may have been illegal disposal on the island in past years could be set aside as humans wouldnt be allowed to dig up anything that may cause further alarm and economic disaster! Lets not cause any further real or imagined problems for the u.s. and give our future a place to live in peace.  
NATURAL RESERVE!!

## Haywood, Paul

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**From:** phil.youngberg@gsa.gov  
**Sent:** Friday, May 21, 2010 12:17 PM  
**To:** Automatic Steam  
**Cc:** Jenkins, Josh; Stelmack, Mark; John Dugan  
**Subject:** Re: Comments: Plum Island

Thank you for your comments. They will be included in the project record and will be considered.

----- Original Message -----

From: Automatic Steam [automaticsteam@yahoo.com]  
Sent: 05/21/2010 06:09 AM MST  
To: Philip Youngberg  
Cc: Automatic Steam <automaticsteam@yahoo.com>  
Subject: Comments: Plum Island

phil.youngberg@gsa.gov

Dear Mr. Youngberg:

I believe the Nature Conservancy's, et al plan for Plum Island is generally the correct approach.

I think that the US Government should own and maintain the island as a refuge and preserve. Simultaneously though, it should possess a military function of security for our coast, the inlet, New London, and Groton. Moreover, special forces/homeland security can conduct training operations for survival in the wild, and even develop low impact lifestyle techniques and methods which may crossover to civilian life. In part, military trainees will - besides training - perform coastal border security/stand watch, and act as hybrid park rangers interacting with the public.

Buildings can be used for training, and nature centers, and for housing for permanent staff. Some primitive camping may be available for visitors.

The whole concept can be done in a way that will provide for an awesome recreational ecological experience for visitors to the site. Probably the park would need to find a way to control the stream of visitors.

In any event, I consider what Teddy Roosevelt might have done in this situation, and conclude that it would be wisest and best to keep this area undeveloped in perpetuity, on behalf of the Good Citizens of the USA and for our Posterity. It is a National, natural treasure, and a strategic site for our National Security, now and/or potentially in the future.

Sincerely,

William Kitsch  
1233 Stanwood Street  
Philadelphia, Pa 19111  
215-673-2800



--- On Fri, 5/21/10, Automatic Steam <automaticsteam@yahoo.com> wrote:

> From: Automatic Steam <automaticsteam@yahoo.com>  
> Subject: plum island  
> To: "Automatic Steam" <automaticsteam@yahoo.com>  
> Date: Friday, May 21, 2010, 6:59 AM  
> Conservationists eye Plum Island for  
> future wildlife refuge  
>  
> By Judy Benson  
>  
> Publication: The Day  
> Published 05/21/2010 12:00 AM  
> Updated 05/21/2010 12:52 AM  
> Day file photo  
> Aerial view of Plum Island, which sits off the north fork of Long  
> Island. A conservation group wants the 800-acre island turned into a  
> wildlife preserve once the government's animal disease lab moves to  
> Kansas.  
> Day file photo  
> Aerial view of Plum Island, which sits off the north fork of Long  
> Island. A conservation group wants the 800-acre island turned into a  
> wildlife preserve once the government's animal disease lab moves to  
> Kansas.  
> 1  
> 1  
> COMMENTS ( 1 )  
> Bookmark and Share  
> print this article  
> Property should not be developed after lab is closed, they argue  
>  
> While Plum Island remained off-limits to most humans for the last 50  
> years, birds by the hundreds have nested, rested and bred on its sandy  
> shores and rocky beaches.  
>  
> The large populations of loons, scoters, buffleheads, piping plovers,  
> least and roseate terns and dozens of other species, along with wild  
> orchids and other rare plants, are the main reasons why conservation  
> groups are advocating that the 843-acre island should become a  
> national wildlife refuge with public nature trails when the federal  
> animal disease laboratory now there closes.  
>  
> Because of the risks associated with the viruses researched at the  
> lab, the public has been banned from the island.  
>  
> The Connecticut Fund for the Environment/Save the Sound, the Fishers  
> Island Conservancy, the Connecticut chapter of the Nature Conservancy  
> and a new organization, the Preserve Plum Island Coalition, comprising  
> 24 environmental groups and experts, began making their case to the  
> federal government, which owns the island, at two meetings this week.  
> The meetings, in Old Saybrook Wednesday and Greenport, L.I., Thursday,  
> were held to give the public a chance to comment on the planned sale  
> of the island once the lab moves to a new, \$450 million facility in

> Manhattan, Kan. Design work for the new lab is under way.

>

> "If you believe your mandate is to sell to the highest bidder, then  
> our group and many others will be very upset and this process will  
> extend for longer than any of us would desire," Curt Johnson, senior  
> attorney for the Connecticut Fund for the Environment/Save the Sound  
> told federal officials at Wednesday's meeting. "The sale of this  
> island is a really, really big deal from an ecological and federal  
> policy point of view."

>

> Johnson noted that the island was designated in a 2006 agreement among  
> the federal Environmental Protection Agency, the U.S. Fish and  
> Wildlife Service, and New York and Connecticut as one of 33 of the  
> most significant sites in Long Island Sound for ecological, scientific  
> and recreational values.

>

> Protection agreement

>

> The agreement earmarks the 33 sites in the Long Island Sound  
> Stewardship Initiative for efforts to "acquire or protect them through  
> easements," and called Plum Island an "exemplary bird habitat of  
> national if not international significance." The Audubon Society has  
> identified it as one of its "Important Bird Areas."

>

> Johnson argued that the federal government would be in conflict with  
> its own laws and policies - the stewardship policy, as well as the  
> Endangered Species Act and the Coastal Zone Management Act - if it  
> sold the entire island for redevelopment. Instead, he suggested that  
> only the portion of the island already developed - about 10 percent of  
> the total - should be sold for reuse, and the rest should become a  
> preserve. In addition to the lab, there are also the remains of Fort  
> Terry, a military facility dating from  
> 1897 that was decommissioned in 1948.

>

> Federal and state governments spend millions to acquire ecologically  
> important properties, Johnson added, but Plum Island is one that is  
> already government owned, so selling it would make no sense.

>

> Johnson addressed his comments to officials from the General Services  
> Administration, which is handling the sale, and the Department of  
> Homeland Security, which oversees the lab with the U.S. Department of  
> Agriculture. The officials said they expected an environmental study  
> of the impact of the planned sale to be completed this summer.  
> Johnson, however, said a complete study would take at least a year  
> because of Plum Island's importance for different populations of  
> migratory birds in different seasons.

>

> John Verrico, spokesman for the Science and Technology Directorate of  
> the Department of Homeland Security, said Thursday that the Plum  
> Island lab would remain open at least until 2018, the earliest the new  
> lab could be ready. While some in Connecticut and Long Island are  
> still hoping the  
> 2008 decision by Congress to close the Plum Island lab will be  
> reversed, Verrico said there is little reason to believe that will  
> happen.

>

> The existing lab, opened in 1954, is outdated, he said. The kinds of

> animal diseases that currently need to be studied, he added, require a  
> higher level of biological protection and security for the scientists  
> and the public than the Plum Island lab can handle. He listed eight  
> livestock viruses that are the main concerns, some of which can pass  
> from animals to humans.  
>  
> "These are emerging diseases, not found here in the U.S.,"  
> Verrico said. "We could not upgrade the current facility and  
> infrastructure there without having to build an entirely new  
> facility."  
>  
> Building a new lab in Kansas would be cheaper, he said. It would also  
> provide the nation with a lab that is more accessible than Plum Island  
> when disease samples need to be brought in and diagnosed quickly, he  
> added.  
>  
> Plum Island is accessible only by ferry service from Orient Point,  
> Long Island and Old Saybrook. About 180 New York residents work on the  
> island, and about 150 are from Connecticut. The 9.5-acre ferry landing  
> in Orient Point will also be offered for sale.  
>  
> Jobs also an issue  
>  
> During Wednesday's meeting, Old Saybrook Selectman William Peace and  
> Christopher Mitchell of Lyme called attention to the loss of good  
> local jobs the Plum Island lab closure would bring.  
>  
> "It seems to me the human element of a lot of people losing their jobs  
> has been lost" in the talk about the island's future, said Mitchell,  
> who has worked on the island's ferry for the last 12 years.  
>  
> The island is located within the boundaries of the town of Southold,  
> N.Y., but since all 843 acres have been owned by the federal  
> government since 1901, the property has never been subjected to  
> municipal zoning. Southold Supervisor Scott Russell said the town is  
> working through the New York congressional delegation to try to keep  
> the lab from closing.  
>  
> "My first goal is jobs," he said.  
>  
> The town would be opposed to redevelopment of the island for high-end  
> housing, Russell said. If the lab does close, the town may be more  
> likely to favor that most of the island stay in its natural state, and  
> the developed part be turned into a research facility connected to a  
> university.  
>  
> But whether the new lab will ever be built, Russell believes, is far  
> from certain, so discussions about the island's future may be  
> premature.  
>  
> "The big question now is, is this going to be a fruitless exercise?"  
> he said.  
>  
> j.benson@theday.com  
>  
> FOR MORE INFORMATION  
>

> Comments and inquiries about the planned sale of Plum Island and the  
> 9.5-acre ferry landing at Orient Point will be received through June  
> 2. They should be sent to: Phil Youngberg c/o John Dyson; GSA; 10  
> Causeway St. Room 925; Boston MA 02222. They can also be sent via  
> e-mail to: phil.youngberg@gsa.gov or by phone at (617) 565-5709.  
>  
> Information can be found at [www.plumislandny.com](http://www.plumislandny.com)  
>  
>  
>  
>

## Haywood, Paul

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**From:** phil.youngberg@gsa.gov  
**Sent:** Friday, May 21, 2010 12:14 PM  
**To:** George Reed  
**Cc:** Jenkins, Josh; Stelmack, Mark; John Dugan  
**Subject:** Re: Plum Island after the lab.

Thank you for your comments. They will be included in the project record and will be considered.

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**From:** George Reed [gereed@tvconnect.net]  
**Sent:** 05/21/2010 06:40 AM AST  
**To:** Philip Youngberg  
**Subject:** Plum Island after the lab.

This comment from a Connecticut citizen, not affiliated with any organization.

Ref: Article "*Conservationists eye Plum Island for future wildlife refuge*", The New London Day, 05/21/10.

If the lab is closed, might the 843 acre island be a reasonable candidate to accommodate energy-related development such as solar, wind, or LNG projects?

George Reed

## Haywood, Paul

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**From:** phil.youngberg@gsa.gov  
**Sent:** Friday, May 21, 2010 12:18 PM  
**To:** Joseph Presslitz  
**Cc:** Jenkins, Josh; Stelmack, Mark; John Dugan  
**Subject:** Re: Plum Island

Thank you for your comments. They will be included in the project record and will be considered.

---

**From:** Joseph Presslitz [beoromeo@sbcglobal.net]  
**Sent:** 05/21/2010 07:07 AM MST  
**To:** Philip Youngberg  
**Subject:** Plum Island

Mr. Youngberg,

Plum Island has been strictly off limits (I realize that it was due to the research facility on site) for over fifty years to the public.

I feel strongly that Plum Island should remain strictly off limits permanently from the public and reserved as a wildlife habitat and refuge, especially for the endangered and threatened Roseate Terns and Common Terns that migrate here to nest each year from South America. People do not need another 850 acres to encroach upon.

Plum Island, certainly, should NOT be open for sale of any sort nor to any individual(s) and should remain under the protection of the U.S. government. An environmentally sensitive island, Plum Island must be reserved for nature and her endangered/threatened species that rely on it for their future generations.

Thank you,

Jean Presslitz

## Haywood, Paul

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**From:** phil.youngberg@gsa.gov  
**Sent:** Friday, May 21, 2010 12:20 PM  
**To:** Fisher, Victoria - SOL  
**Cc:** Jenkins, Josh; Stelmack, Mark; John Dugan  
**Subject:** Re: Plum Island

Thank you for your comments. They will be included in the project record and will be considered.

---

**From:** "Fisher, Victoria - SOL" [Fisher.Victoria@DOL.GOV]  
**Sent:** 05/21/2010 11:56 AM AST  
**To:** Philip Youngberg  
**Subject:** Plum Island

I admittedly know nothing about this – only one short article on Yahoo. I wonder why anyone (short of money) would consider moving a facility which researches contagious or deadly viruses etc to the middle of the heartland. The public has been banned from the island and they want to move it to Manhattan, Kansas? Please.

Exactly who and what will be gained from this venture? It can't be a job force issue – gain however many in Kansas – lose however many in Connecticut/NY. Probably some salary breaks? Where will the waste go from this stuff – in our wheat fields? Outbreaks could conceivably be and probably have been (hopefully) contained on an island.

Lest I start ranting and raving – if my vote counts at all I think

1. the site should not be moved to Kansas, renovate rebuild on the island – or if they must put everyone in danger –
2. then leave that island as an ecological preserve.

Vicky Fisher  
Management Analyst  
U.S. Department of Labor

## Haywood, Paul

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**From:** phil.youngberg@gsa.gov  
**Sent:** Monday, May 24, 2010 12:20 PM  
**To:** beattyh333@msn.com  
**Cc:** Stelmack, Mark; Jenkins, Josh; john.dugan@gsa.gov  
**Subject:** Re: plum island

Thank you for your comments and they will become part of the public record for this project.

Phil Youngberg  
404-562-0787 office  
404-433-8393 cell

"Jeanne Beatty" <[beattyh333@msn.com](mailto:beattyh333@msn.com)>

05/21/2010 01:41 PM

To <[phil.youngberg@gsa.gov](mailto:phil.youngberg@gsa.gov)>  
cc  
Subject plum island

Please make this a wildlife refuge!!!! with the oil spill destroying so much of our world and ocean this is something there should be no question about.

thankyou  
jenine brooks  
portland ore



## Haywood, Paul

---

**From:** phil.youngberg@gsa.gov  
**Sent:** Monday, May 24, 2010 12:10 PM  
**To:** krdrew4003@yahoo.com  
**Cc:** Jenkins, Josh; john.dugan@gsa.gov; Stelmack, Mark  
**Subject:** Re: Plum Island

Thank you for your comments and they will become part of the public record for this project.

Phil Youngberg  
404-562-0787 office  
404-433-8393 cell

Kevin Drew <[krdrew4003@yahoo.com](mailto:krdrew4003@yahoo.com)>

05/21/2010 07:47 PM

To [phil.youngberg@gsa.gov](mailto:phil.youngberg@gsa.gov)  
cc  
Subject Plum Island

I would like to see the federal government keep the island and make it a federal prison for terrorists. Maybe even have NY put a state prison for sex offenders that can't be released into society.

Thank you,

Kevin R. Drew  
Sag Harbor, NY

## Haywood, Paul

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**From:** phil.youngberg@gsa.gov  
**Sent:** Monday, May 24, 2010 12:09 PM  
**To:** Chas95@aol.com  
**Cc:** Jenkins, Josh; john.dugan@gsa.gov; Stelmack, Mark  
**Subject:** Re: Plum Island

Thank you for your comments and they will become part of the public record for this project.

Phil Youngberg  
404-562-0787 office  
404-433-8393 cell

[Chas95@aol.com](mailto:Chas95@aol.com)

05/21/2010 11:25 PM

To [phil.youngberg@gsa.gov](mailto:phil.youngberg@gsa.gov)  
cc  
Subject Plum Island

It is very disturbing to hear that the Federal Government is contemplating selling Plum Island to private developers. This pristine island should be left in it's natural state. There is so much history on Plum Island and it is also a wonderful undisturbed breeding ground for shore birds. I live in Old Lyme, CT and can see the island from our beach. It would be a crime to see condo's and McMansion's go up on this lovely island. It is bad enough that so many people in Connecticut and New York now working on the island will lose their jobs when the research facility closes and development would add insult to injury if the island is developed.

Sincerely,

Marilyn Ossmann

## Haywood, Paul

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**From:** Jenkins, Josh  
**Sent:** Tuesday, May 25, 2010 11:07 AM  
**To:** Bourdeau, Jonathan; Bales, Nancy  
**Subject:** FW: Tim Bishop Scoping Meeting Remarks

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**From:** Schneider, Jon [mailto:Jon.Schneider@mail.house.gov]  
**Sent:** Tuesday, May 25, 2010 11:03 AM  
**To:** Jenkins, Josh  
**Subject:** Tim Bishop Scoping Meeting Remarks

Statement of Congressman Tim Bishop  
Plum Island Scoping Meeting  
May 20, 2010

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I would like to thank the General Services Agency and the Department of Homeland Security for holding tonight's scoping meeting, Greenport High School for serving as host. I also thank everyone from this community who have come tonight to share their thoughts on the future of Plum Island. I apologize that because of votes tonight, I cannot be there in person.

The process involved with the sale of Plum Island and the construction of the National Bio- and Agro-defense Facility (NBAF) in Manhattan, Kansas could be given as Exhibit A in why so many people are skeptical about government.

Given our nation's mounting budget deficits and the need to balance our spending priorities, many have questioned the wisdom of spending over \$650 million of taxpayer dollars to create a massive new research facility that would duplicate many of the functions currently served by Plum Island and other existing facilities. I believe that there are more cost-effective solutions than the NBAF to meet the nation's agro-defense research needs, including continuing efforts to modernize existing facilities around the country.

Under the previous administration, the Department of Homeland Security assured members of Congress that the sale of Plum Island would come close to covering the costs of closure, transfer and construction of NBAF. However, the evidence suggests that is just flat wrong.

As a point of reference for a reasonable expectation of what Plum Island might sell for – Robins Island, a 435-acre island also within the jurisdiction of Southold Town, like Plum Island – sold for \$11 million in 1993 and had no clean up or decommissioning requirements. Given property value increases over the past seventeen years, recent estimates place the current value of Plum Island's 840 acres in the range of \$50 to \$80 million. This is assuming there is an interested buyer who wants to lay out tens of millions to buy an island which even Hannibal Lecter turned his nose up at, zoning which will likely be drastically altered by the Town of Southold, and the prospect of not being able to construct anything or realize any return on investment for at least a decade.

And, by the way, that is before we even scratch the surface of decommissioning the Animal Disease Center and clean up whatever mess the federal government has made at this highly toxic and hazardous site. In short, if someone thinks this sale will net the federal government dime one, forget about an island, I've got a bridge to sell you.

A \$50-80 million sale does not pay for a \$650 million project. Not in Long Island, not in Kansas, not even in Washington.

Tonight, I believe you will hear a lot of good ideas from the community about Plum Island's future. I agree with those who say the island would be an ideal location for a National Refuge. Ironically, its isolation and unique federal presence has preserved much of Plum Island. This goal would not be at odds with a limited presence on the existing developed site, such as an alternative energy research facility.

I will leave it to others to spell out alternatives more clearly, because my single-minded immediate focus is to do the one sane thing, and keep the current research facility on the island and block the unnecessary NBAF.

Without any funding in place to build NBAF, the Department of Homeland Security has never adequately answered questions raised by a 2009 Government Accountability Office report, which concluded that a Foot-and-Mouth disease outbreak on Plum Island would have a \$31 million economic impact, while the same event would have a \$1 billion impact in Kansas. Here is a direct quote from that report: "Given the significant limitations in DHS's analyses that we found, the conclusion that FMD work can be conducted as safely on the mainland as on Plum Island is not supported."

Before we cross a point of no return, I want everyone to open their eyes and look at what we're doing here. We have not begun decommissioning Plum Island, we have not laid a single brick or appropriated a single dollar to construct NBAF. Rather than pour hundreds of millions of taxpayer dollars down a sinkhole in Kansas and open the Pandora's Box of decommissioning Plum Island, we should abandon NBAF and make use of existing facilities that continue to serve this nation well.

Again, thank you for holding this hearing tonight and listening to the voices of our community.

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Jon Schneider  
Deputy Chief of Staff/District Director  
Office of Congressman Tim Bishop (NY-01)  
(631) 696-6500

[www.house.gov/timbishop](http://www.house.gov/timbishop)  
[\*Sign up for Congressman Bishop's e-newsletter\*](#)

## Bourdeau, Jonathan

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**From:** Jenkins, Josh  
**Sent:** Friday, June 04, 2010 10:10 AM  
**To:** Bourdeau, Jonathan  
**Subject:** FW: NY DOT comment  
**Attachments:** 2010.05.27\_NY DOT comment.pdf

FYI

***Josh Jenkins***  
***770.421.3412***

---

**From:** john.dugan@gsa.gov [mailto:john.dugan@gsa.gov]  
**Sent:** Friday, June 04, 2010 9:37 AM  
**To:** Jenkins, Josh; Stelmack, Mark  
**Cc:** phil.youngberg@gsa.gov  
**Subject:** NY DOT comment

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John L. Dugan  
Real Property Utilization & Disposal Division  
U.S. General Services Administration  
10 Causeway Street, Room 925  
Boston, MA 02222  
Office: 617.565.5709  
Cell: 617.921.0431  
Fax: 617.565.5720



STATE OF NEW YORK  
DEPARTMENT OF TRANSPORTATION  
STATE OFFICE BUILDING  
250 VETERANS MEMORIAL HIGHWAY  
HAUPPAUGE, N.Y. 11788-5518

SUBIMAL CHAKRABORTI, P.E.  
REGIONAL DIRECTOR

STANLEY GEE  
ACTING COMMISSIONER

May 27, 2010

Mr. Phil Youngberg  
Environmental Manager  
Public Building Services  
U.S. General Services Administration  
Thomas P. O'Neill, Jr. Federal Bldg.  
10 Causeway St, Room 925  
Boston, MA 02222

**TAG # 10-0142**  
**CAG # 10-007482**  
EIS for the sale of Plum Island

Dear Mr. Youngberg:

On behalf of the New York State Department of Transportation (NYSDOT), thank you for inviting the NYSDOT to participate in the Public Scoping Meeting for the preparation of an EIS regarding the sale of Plum Island.

A member of my staff represented the NYSDOT at the meeting held in Greenport, NY on May 20, 2010, and we look forward to continuing our involvement as this process moves forward.

Very truly yours,

A handwritten signature in dark ink, appearing to read "Wayne R. Ugolik".

Wayne R. Ugolik  
Director, Regional Planning and Program Management

## Bourdeau, Jonathan

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**From:** Jenkins, Josh  
**Sent:** Thursday, June 03, 2010 10:07 AM  
**To:** Bourdeau, Jonathan  
**Subject:** FW: PLum Island Scoping period

**Josh Jenkins**  
**770.421.3412**

---

**From:** john.dugan@gsa.gov [mailto:john.dugan@gsa.gov]  
**Sent:** Thursday, June 03, 2010 10:00 AM  
**To:** Steve\_Papa@fws.gov  
**Cc:** Jenkins, Josh; Stelmack, Mark; phil.youngberg@gsa.gov  
**Subject:** Re: PLum Island Scoping period

Mr. Papa,

I wanted to follow up with you from our phone conversation from yesterday. We have agreed to extend the scoping period for the Plum Island EIS until Wednesday June 16th, you may forward your comments to me in an email or mail a hard copy letter.

Thank You.

---

John L. Dugan  
Real Property Utilization & Disposal Division  
U.S. General Services Administration  
10 Causeway Street, Room 925  
Boston, MA 02222  
Office: 617.565.5709  
Cell: 617.921.0431  
Fax: 617.565.5720

[Steve\\_Papa@fws.gov](mailto:Steve_Papa@fws.gov)

05/28/2010 09:03 PM

To [john.dugan@gsa.gov](mailto:john.dugan@gsa.gov)  
cc  
Subject PLum Island Scoping period

Is there a chance an extension could be granted to the FWS for submission of comments during the public scoping period?

Thanks

Steven T. Papa  
Senior Endangered Species/Federal Projects Biologist  
U.S. Fish and Wildlife Service

Long Island Field Office  
3 Old Barto Road  
Brookhaven, NY 11719  
(631) 776-1401 (tel)  
(631) 776-1405 (fax)  
[Steve\\_Papa@fws.gov](mailto:Steve_Papa@fws.gov) (email)  
<http://longisland.fws.gov> (web)



**Bourdeau, Jonathan**

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**From:** john.dugan@gsa.gov  
**Sent:** Wednesday, June 02, 2010 2:48 PM  
**To:** Jenkins, Josh; Stelmack, Mark  
**Cc:** phil.youngberg@gsa.gov; john.kelly@gsa.gov  
**Subject:** Suffolk County Comments  
**Attachments:** 2010.05.28\_Suffolk County Scoping Comments.pdf; 2010.05.28\_Suffolk County Aquaculture Lease Program.pdf

FYI - This just came in today

---

John L. Dugan  
Real Property Utilization & Disposal Division  
U.S. General Services Administration  
10 Causeway Street, Room 925  
Boston, MA 02222  
Office: 617.565.5709  
Cell: 617.921.0431  
Fax: 617.565.5720

# COUNTY OF SUFFOLK



**STEVE LEVY**  
SUFFOLK COUNTY EXECUTIVE

DEPARTMENT OF PLANNING

THOMAS A. ISLES, A.I.C.P.  
DIRECTOR OF PLANNING

May 28, 2010

Mr. Phil Youngberg  
Environmental Manager, Public Buildings Service  
U.S. General Services Administration  
Thomas P. O'Neill, Jr. Federal Building  
10 Causeway Street, Room 925  
Boston, MA 02222

RE: Proposed Sale of Plum Island, New York  
National Environmental Policy Act (NEPA)  
Initial Comments

Dear Mr. Youngberg:

These initial comments are provided in response to the "Request for Information for the Environmental Impact Statement" for the Sale of Plum Island, Orient Point, New York. We offer the following comments:

- ☐ All alternatives should be evaluated based upon their potential impact to water quality, shellfish and finfish resources in both the Peconic and Gardiners Bays.
- ☐ Suffolk County owns the underwater lands to the south of Plum Island. Specifically, N.Y. Environmental Conservation Law § 13-0302 (1) provides the following:

Underwater lands ceded to County of Suffolk. All the right, title and interest in which the people of the state of New York have in and to the lands under water of Gardiner's and Peconic Bays in the County of Suffolk, except underwater lands within one thousand feet of the high water mark is hereby ceded to such county, for the purposes of shellfish cultivation, to be managed and controlled by such county, provided that such land shall revert to the state when they shall cease to be used for shellfish cultivation. For the purposes of this section, the term "Gardiner's and Peconic Bays" shall mean the waters of Gardiner's and Peconic Bays and the tributaries thereof between the westerly shore of Great Peconic Bay and an easterly line running from the most easterly point of Plum Island to Goff Point at the entrance of Nepeague Harbor.


Given this interest, Suffolk County is potentially an involved, decision-making agency. Accordingly, we request copies of all documents generated as a result of the NEPA process.

- ☐ In accordance with your correspondence dated April 28, 2010, we request a meeting with the Government Services Administration (GSA) in order to discuss the proposed sale of Plum Island and its associated ramifications.
- ☐ Consideration should be given to the inclusion of an additional alternative involving the preservation of the island for open space purposes.
- ☐ The EIS should analyze all potential impacts associated with soil and groundwater contamination/quality and any potential impacts associated with future development/use of the property.
- ☐ The EIS should include analysis of potential economic impacts to the local economy from the standpoint of local job elimination and the discontinuance of expenditures on local goods and services associated with the operation and maintenance of the site.

Enclosed please find also a copy of a summary which describes the County's ongoing Shellfish Aquaculture Lease program along with a copy of N.Y. Environmental Conservation Law § 13-0302.

Thank you for the opportunity to provide these initial comments in connection with the Request for Information for the Environmental Impact Statement for the Sale of Plum Island, Orient Point, New York.

Sincerely,



Thomas A. Isles, A.I.C.P.  
Director

TAI:bd

Enclosures (2)

cc: Daniel Gulizio, Deputy Director, S.C. Department of Planning  
DeWitt S. Davies, Chief Environmental Analyst, S.C. Department of Planning  
James Bagg, Chief Environmental Analyst, S.C. Department of Planning  
Lauretta R. Fischer, Principal Environmental Analyst, S.C. Department of Planning  
Michael Mulé, Senior Planner, S.C. Department of Planning

Effective: September 14, 2004

McKinney's Consolidated Laws of New York Annotated Currentness

Environmental Conservation Law (Refs & Annos)

Chapter 43-B. Of the Consolidated Laws (Refs & Annos)

Article 13. Marine and Coastal Resources (Refs & Annos)

Title 3. Marine Fisheries (Refs & Annos)

→ **§ 13-0302. Lands underwater of Gardiner's and Peconic bays**

1. Underwater lands ceded to county of Suffolk. All the right, title and interest in which the people of the state of New York have in and to the lands under water of Gardiner's and Peconic bays in the county of Suffolk, except underwater lands within one thousand feet of the high water mark is hereby ceded to such county, for the purposes of shellfish cultivation, to be managed and controlled by such county, provided that such lands shall revert to the state when they shall cease to be used for shellfish cultivation. For the purposes of this section, the term "Gardiner's and Peconic bays" shall mean the waters of Gardiner's and Peconic bays and the tributaries thereof between the westerly shore of Great Peconic bay and an easterly line running from the most easterly point of Plum island to Goff point at the entrance of Napeague harbor.

2. Ratification. The grant of lands under the waters of Gardiner's and Peconic bays, by the commissioners of shell fisheries, in accordance with the provisions of chapter 385 of the laws of 1884, as amended, subsequently held and used by the grantees, heirs, successors, and assigns on which all taxes and assessments have been paid, are hereby ratified and confirmed. Any underwater lands in Gardiner's and Peconic Bays previously granted that revert or escheat to the state or are subject to tax deed by the county of Suffolk shall be available to the county for leasing pursuant to this section. All other lands under such waters, which pursuant to such chapters, have escheated or reverted to the state, are hereby ceded to Suffolk county for the purposes of the cultivation of shellfish, subject to existing valid grants and easements; provided however, that nothing in this section shall interfere with the right of the commissioner of general services to grant lands and easements under water to owners of adjacent uplands, pursuant to the provisions of the public lands law, or of the legislature to make such grants without regard to upland ownership, and to grant franchises to utilities, municipalities and governmental, educational, or scientific bodies for cables, outfalls, ecological studies, and experimentation with controlled marine life.

3. Leases. Suffolk county may lease lands under water ceded to it by the state for the purpose of shellfish cultivation. Provided if no such leases have been executed by December thirty-first, two thousand ten, such authority to lease pursuant to this section shall terminate.

a. Leases may be issued only within areas designated as shellfish cultivation zones on a map or maps to be prepared and approved by the county of Suffolk.

b. No lease shall be granted except upon written application on forms furnished by the county of Suffolk, and properly executed and signed by the applicant.

c. Before a lease is approved, notice shall be provided for at least two months by posting such notice at the bureau of marine resources in the department, the office of the county clerk, and the office of the town clerk in which all or any part of the lands to be leased are located. Such notice shall also be published in the official newspaper of the county. The notice shall include the name of the lessee, the boundaries of the lease, and the area of the lease. A copy of the proposed lease shall be available for public inspection and copying in the office of the county clerk.

4. Establishment of shellfish cultivation zones. Before leasing or using the lands hereby ceded to it, the county of Suffolk shall cause an accurate survey to be made of such lands, and a map or maps to be prepared therefrom. Such map or maps shall establish shellfish cultivation zones within Gardiner's and Peconic bays. Such map or maps shall be approved by local law. After such map or maps have been adopted, the county shall have the authority to issue leases for shellfish cultivation within the shellfish cultivation zones, as provided herein. Such map or maps shall be updated by the county of Suffolk every five years.

a. Underwater lands within one thousand feet of the high water mark shall not be included in a shellfish cultivation zone.

b. Underwater lands where bay scallops are produced regularly and harvested on a commercial basis shall not be included in a shellfish cultivation zone.

c. Underwater lands where there is an indicated presence of shellfish in sufficient quantity and quality and so located as to support significant hand raking and/or tonging harvesting shall not be included in a shellfish cultivation zone.

d. Underwater lands where the leasing will result in a significant reduction of established commercial finfish or crustacean fisheries shall not be included in a shellfish cultivation zone.

5. Regulations. The county shall, by local law, before leasing any such underwater lands, adopt regulations governing:

a. applications for leases;

b. notices to be given;

c. the form and terms of leases;

d. standards for the approval or denial of leases;

e. administration of leases;

f. the transfer or renewal of leases;

g. marking grounds and testing;

h. fees;

i. recording of leases;

j. bonds; and

k. such other matters as are appropriate to the leasing program.

6. Department authority. Notwithstanding any of the provisions of this section:

a. any person engaging in the cultivation or harvesting of shellfish in a shellfish cultivation zone pursuant to this

section shall obtain a permit in accordance with section 13-0316 of this title; and

b. the department shall regulate and control the use of certain types of vessels and equipment for harvesting shellfish, requirements for reseeding, the right to enter upon such leased lands for reseeding or making shellfish population surveys, and enforce all other applicable state laws relating to said underwater lands.

7. Duties of the county clerk. Leases issued pursuant to this section shall be recorded in the office of the county clerk in the manner and form to be determined by local law as provided in subdivision five of this section.

8. Summary proceedings. Upon the failure of a lessee to pay the rental on any date due under the terms of the lease or upon revocation as provided for by local law pursuant to subdivision five of this section, the county may, after written notice to the lessee declare the lease cancelled as of the date set forth in such notice, and may immediately thereafter evict the lessee from such lands. The provisions of article seven of the real property actions and proceedings law shall apply and govern the procedure in such case.

9. Disposition of fees and rents. All fees and rents received shall be deposited into the general fund of the county. However, in the alternative, nothing shall prohibit the county of Suffolk, by local law, from establishing a special fund for the promotion of aquaculture where such fees and rents shall be deposited.

#### CREDIT(S)

(Added L.2004, c. 425, § 3, eff. Sept. 14, 2004.)

#### HISTORICAL AND STATUTORY NOTES

2006 Main Volume

L.2004, c. 425 legislation

L.2004, c. 425, §§ 1, 2, 4, provide:

“§ 1. Legislative findings. Pursuant to chapter 385 of the laws of 1884, as amended, and chapter 990 of the laws of 1969, the legislature ceded to the county of Suffolk the underwater lands of Gardiner's and Peconic bays as described in such chapters and provided for a statutory framework whereby the business of cultivating shellfish could be managed and regulated. Chapter 990 of the laws of 1969 gave the county of Suffolk the right to lease such underwater lands to persons engaged in shellfish cultivation. Such chapter also ratified and confirmed the title to underwater land grants pursuant to chapter 385 of the laws of 1884, as amended, in which taxes had been paid.

“After more than thirty years, the county of Suffolk still has not undertaken a leasing program to persons cultivating shellfish as was intended by chapter 990 of the laws of 1969. Such a program has not been established in spite of the fact that the potential economic benefits from promoting aquaculture to the county of Suffolk and the state of New York are substantial.

“A leasing program has not been enacted by the county of Suffolk because a shellfish cultivation program as permitted by the provisions of chapter 990 of the laws of 1969 would be too costly and cumbersome to implement. The failure to undertake an aquaculture leasing program for these underwater lands in Gardiner's and Peconic bays has resulted in adverse economic impacts and the loss of economic opportunity for the region.

“The county of Suffolk has worked diligently to study ways to foster shellfish cultivation in Gardiner's and Peconic

bays. By Resolution 487-2001, Suffolk county established a fourteen member Suffolk county aquaculture committee. In June 2002 such committee issued a report entitled "Policy Guidance for Suffolk County on Shellfish Cultivation in Peconic and Gardiner's Bays". Such report made recommendations on policy issues relating to the lease of underwater lands for the cultivation of shellfish.

"Based upon such report, Suffolk county approved Resolution 1229-2002 which directed the county's agencies to prepare a more specific survey plan for shellfish cultivation leasing in Peconic and Gardiner's bays. Such report was completed in April 2003. Such report, prepared by the county addresses policy issues related to shellfish cultivation, and identified several changes to state law, specifically chapter 990 of the laws of 1969, which would be required to implement a successful shellfish cultivation leasing program. Suffolk county, by Scnsc Resolution 39-2003 requested that the state make such legislative amendments. In addition, in July 2001, the Nature Conservancy of Long Island formed the Peconic Bay Aquaculture Advisory Committee to study and make recommendations with regard to the numerous issues involved in establishing a viable and environmentally sustainable aquaculture program in the Peconic region. This advisory committee identified eighteen specific recommendations for the aquaculture program. Those recommendations are incorporated as part of the findings of this act. Such recommendations will be critical to the success of the county's shellfish cultivation leasing program.

"It is the purpose of this act to amend the existing law regarding the leasing of underwater lands in Gardiner's and Peconic bays in order to foster the establishment and obtain the economic benefits of a shellfish cultivation leasing program consistent with established conservation principles. It is also the purpose of this act to ratify, confirm, and clarify the rights to cultivate shellfish underwater land grants issued under previous statutes.

"§ 4. Effect of other laws. Any provision of chapter 385 of the laws of 1884, as amended, or any other general or special law to the contrary notwithstanding, this act shall be controlling, but all other provisions of such laws, specific, general, or special, not inconsistent herewith shall remain in full force and effect."

"§ 2. Chapter 990 of the laws of 1969, relating to ceding lands under water of Gardiner's and Peconic bays to Suffolk County and to the management of such lands for the cultivation of shellfish, is REPEALED."

McKinney's E. C. L. § 13-0302, NY ENVIR CONSER § 13-0302

Current through L.2009, chapters 1 to 14, 16, 17 and 50 to 56.

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END OF DOCUMENT





Steve Levy  
Suffolk County Executive



## SUFFOLK COUNTY SHELLFISH AQUACULTURE LEASE PROGRAM IN PECONIC BAY AND GARDINERS BAY



### Contents:

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### Introduction

Suffolk County (County) has adopted a shellfish aquaculture lease program (Lease Program) pursuant to Resolution No. 646-2009 that provides secure access to publicly owned underwater lands in Peconic Bay and Gardiners Bay, New York for the purpose of shellfish cultivation. The Lease Program has been designed to fulfill the requirements set forth in New York State Environmental Conservation Law §13-0302 by establishing a framework for the leasing of underwater lands that minimizes environmental impacts and user conflicts while supporting the growth of the shellfish aquaculture industry.

The development of the Lease Program was a formidable undertaking that required the collective knowledge and input from commercial fishermen, shellfish farmers, regulatory agencies, organizations, businesses and other parties familiar with the Peconic Estuary. Obtaining this knowledge was facilitated by the participation of the Aquaculture Lease Program Advisory Committee (ALPAC) over a four year period.

### Suffolk County's Role in Shellfish Aquaculture

Historically, the County had certain authorities pertaining to shellfish cultivation in Peconic Bay and Gardiners Bay under New York State law, and was actively engaged in the administration of a program that issued grants of underwater lands for private oyster farming. Pursuant to New York State Environmental Conservation Law (ECL) §13-0302 and as authorized under the Laws of New York 2004, Chapter 425 (2004 Leasing Law), the State of New York ceded underwater lands in Peconic and Gardiners Bays seaward of the 1,000 foot high water mark to Suffolk County for the purpose of shellfish cultivation. The 2004 Leasing Law contains provisions that eliminate onerous requirements, but also adds safeguards to assure that the legitimate concerns of all bay user groups were considered during development of the Lease Program. Requirements set forth in the 2004 Leasing Law to reduce the impacts of the Lease Program include restrictions specifying where leases cannot be located. Such areas defined by the 2004 Leasing Law are as follows:

- "underwater lands where bay scallops are produced regularly and harvested on a commercial basis"
- "underwater lands where there is an indicated presence of shellfish in sufficient quantity and quality and so located as to support significant hand raking and/or tonging harvesting"
- "underwater lands where the leasing will result in a significant reduction of established commercial finfish or crustacean fisheries."



## The Need for a Shellfish Aquaculture Lease Program

The Lease Program has been developed to provide a mechanism that allows shellfish aquaculturists to continue and expand the cultivation of shellfish. The cultivation of the common oyster (*Crassostrea virginica*) and the hard clam (*Mercenaria mercenaria*) has been and still is an important part of the maritime tradition in Peconic Bay and Gardiners Bay. Presently, shellfish aquaculture activities are conducted in these bays on private underwater land grants (oyster grants) and Temporary Marine Area Use Assignments (TMAUAs) administered by the New York State Department of Environmental Conservation (NYSDEC). The Lease Program supports the continuation of these existing shellfish aquaculture operations, and also encourages moderate growth of the shellfish industry by providing individuals with an opportunity to obtain access to underwater lands. It also provides further stability and security to existing and future shellfish aquaculture operations by issuing 10-year leases. The Lease Program is expected to expand the marine-based economy and create related job opportunities.

## The Lease Program

The County's authority is limited to the conveyance of underwater land for shellfish cultivation, and does not extend to the regulation of this activity. As such, the County controls: the *location* of shellfish farms through issuance of leases on underwater land within an adopted Shellfish Cultivation Zone; and the *extent and intensity* of aquaculture use through limits on lease size and number. However, lease applicants must still obtain all necessary regulatory permits from relevant government agencies for conducting off-bottom or on-bottom shellfish culture activities on their leases. In particular, a shellfish culture permit must be obtained from NYSDEC. The dual functions of the County and NYSDEC will help to ensure that the Lease Program is carried out in accordance with proper environmental mitigation measures to protect marine resources and activities in Peconic and Gardiners Bays.

The Lease Program replaces the existing, *ad hoc* system of providing access to marine resources for shellfish cultivation with a modern approach that assures certainty in terms of its administration, accountability on the part of lessees, and equity among the diverse users of Peconic Bay and Gardiners Bay.

The County has adopted Lease Program regulations governing: applications for leases; notices to be given; the form and term of leases; standards for the approval or denial of leases; administration of leases; the transfer or renewal of leases; recording of leases; and other matters that are appropriate to the Lease Program.





## Shellfish Cultivation Zone

The Shellfish Cultivation Zone map (see pages 4 and 5) shows the area within which shellfish leases can be issued. The Shellfish Cultivation Zone meets all criteria in the 2004 Leasing Law. This 29,969-acre zone includes NYSDEC TMAUA locations; private oyster grants; and other contiguous areas where the impacts/conflicts of shellfish aquaculture activities on environmental resources/socio-economic concerns will be minimal. Leases for new shellfish farms will consist of 5- or 10-acre parcels. New shellfish aquaculture leases are limited to a total of 60 additional acres per year, for a maximum of 300 acres during the first five years of the program, and a total of 600 acres by the tenth year of program implementation. Including those participants that will be given the opportunity to grandfather into the program, the maximum area that could be potentially leased during the first 10 years of program implementation is 3,173.5 acres. This accounts for less than 2.9% of the 110,000 acres of underwater land area subject to the County's shellfish leasing authority. The program also provides municipalities, researchers, and not-for-profit entities with the opportunity to obtain non-commercial shellfish cultivation leases for experimental, educational, and resource restoration purposes.

The Lease Program will be implemented in a way that will allow for program adjustments to mitigate any unforeseen impacts. The Shellfish Cultivation Zone will be reviewed every five years and amended, as necessary. The Lease Program is subject to review during the second 5-year period of implementation to establish program components after 10 years. This review will be based on an environmental assessment, which will include, but is not limited to: data on environmental conditions of the bays; results of the Lease Program to date; need/demand for additional lease space; and town, public and industry input.

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## Lease Program Website

The County's Shellfish Aquaculture Lease Program website has been maintained since the initiation of the work on the specification of technical aspects of the program since June 2005. Complete records of all ALPAC meetings (notices, agendas, meeting summaries, presentations); consultant work task draft reports and associated maps; and all final program reports and related documentation are accessible on this website. The website will be used to post announcements of events and dates and in general, keep the public informed of all meetings and actions that are taken during the public notice and lease site review process, and subsequent execution of lease agreements between Suffolk County and shellfish farmers.

The program website address is listed below.

<http://www.suffolkcountyny.gov/aquaculture>





# SUFFOLK COUNTY SHELLFISH IN PECONIC BAY AREA



LOCATOR



COPYRIGHT 2007, COUNTY OF SUFFOLK, N.Y.  
Real Property Taxmap parcel linework used with permission of Suffolk County Real Property Tax Service Agency (S.R.T.S.A.). This rendering is a DRAFT Map in that 1) the data displayed is an interagency or joint agency work\* produced for the purpose of identifying and correcting data. It is not a final agency determination. It is a not statistical or factual compilation of data. In some cases correct data has been left out and questionable or inaccurate data has been exaggerated to help identify errors. In short, this is a DRAFT MAP produced in an effort to aid in the correction of data and is not held out as being complete or accurate in any way.

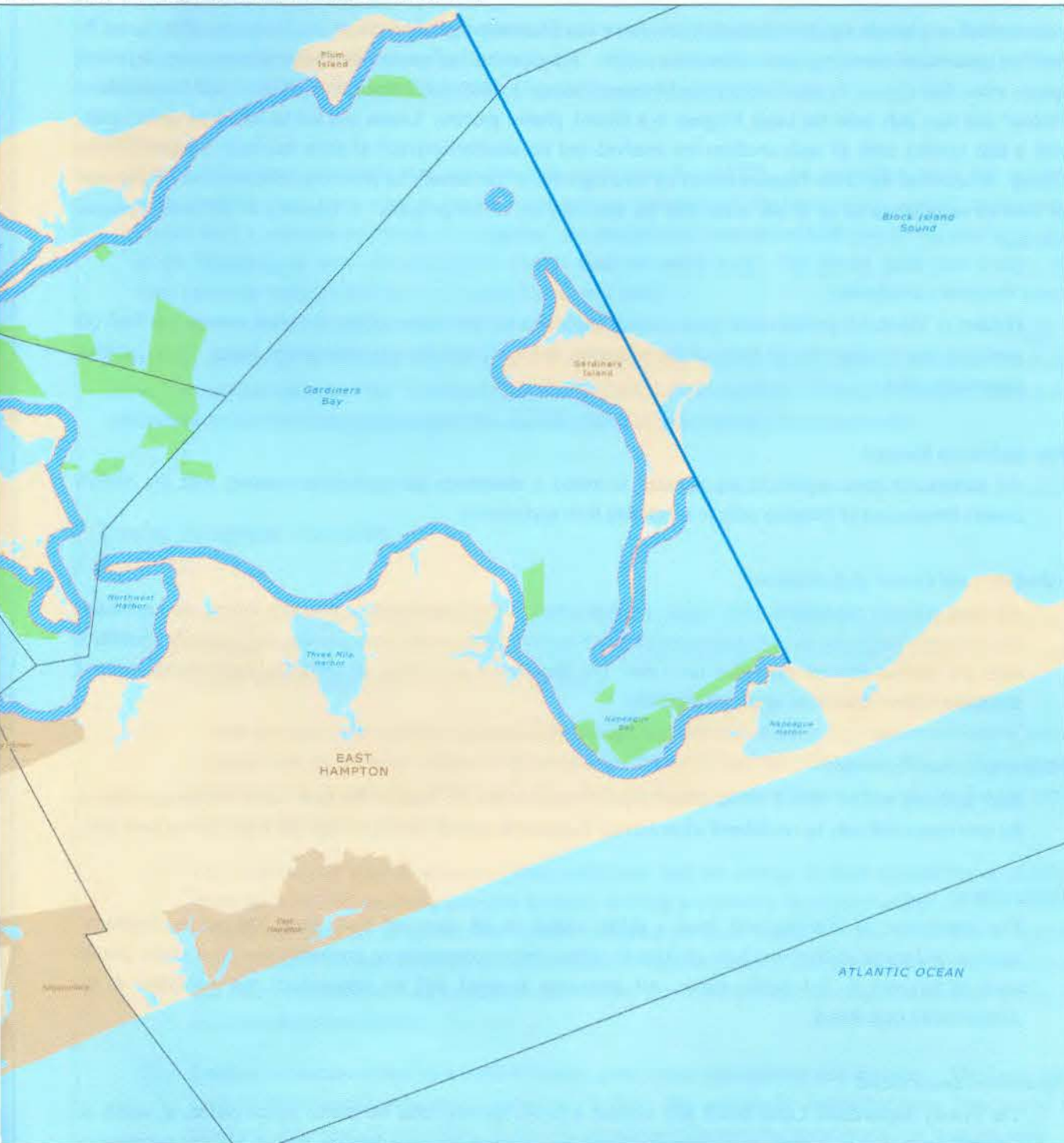
\*As per the provisions of the Freedom of Information Law (Public Officers Law Article 8 Section 84-90) by section 87.2(g)

This map is a compilation of data from:  
1. The New York State Digital Orthographic Aerials  
2. The Suffolk County Real Property Tax Map Parcel Line Work  
3. The Suffolk County Real Property Tax Service GIS Base Map  
4. Field GPS Locations and Verifications

Anthony Abruzzo, L.S.  
Map & Coordinate Supervisor, Department of Environment & Energy  
New York State Land Surveyor License Number 049567



# QUACULTURE LEASE PROGRAM D GARDINERS BAY



## Legend

- Lease Program Boundary (NYSECL 13-0302)
- Town Boundary (SC Real Property Tax Map Agency)
- 1000 ft High Water Mark Buffer
- Shellfish Cultivation Zone
- Village

Shellfish Cultivation Zone Total Area = 29,969 Acres

Approximate scale of total acreage of new leases that could be leased over the first 5 years (300 Acres)

Approximate scale of total acreage of new leases that could be leased by the 10th year (600 Acres)



SUFFOLK COUNTY  
DEPARTMENT OF  
ENVIRONMENT & ENERGY

## MAP 1: SHELLFISH CULTIVATION ZONE

Suffolk County, New York

July 6, 2009 - CD-09-100



## Summary of the Lease Application Process

Existing TMAUAs in the Shellfish Cultivation Zone must be converted into County leases in accordance with the provisions outlined in the Suffolk County Shellfish Aquaculture Lease Program. A private oyster grant holder can apply for a lease on his/her grant, or a portion thereof, if the owner can document a prior historical or current use of the grant for shellfish aquaculture involving species other than oysters. If a grant has had no permitted aquaculture activity involving species other than oysters for the 10-year period between January 1, 1999 and December 31, 2008, it will be considered "fallow" and may only enter the Lease Program in a limited, phased process. Leases will not be issued on oyster grants with a title conflict until all such conflicts are resolved and documentation/proof of same has been submitted to the County. In addition, the Lease Program allows for future growth of the industry by providing additional use of underwater land for aquaculture on up to 600 acres over the first 10 years of the program. A summary of the leasing process follows:

### *Lease Program Participants:*

Holders of TMAUAs; private oyster grant owners; applicants for new leases subject to annual acreage cap limit (60 acres per year for the first 10 years of the program); and applicants for non-commercial leases (municipalities, researchers, etc.).

### *Pre-Application Meeting:*

All prospective lease applicants are required to attend a mandatory pre-application meeting with the Suffolk County Department of Planning prior to submitting their applications.

### *Submission and Review of Application:*

All lease program participants must submit an application to the Department of Planning during the application period established by the County. Lease applicants, other than private oyster grant owners, must identify a preferred lease site location and two alternative lease sites. The Department will review all completed applications received, and make a determination on applicant eligibility.

### *Number of Leases Permitted:*

Each applicant will be limited to two leases; separate applications are required for each lease. Second applications for new leases will only be considered when acreage is available and the annual acreage cap limit has not been met.

### *Public Notice:*

The Department of Planning will issue a public notice on all proposed lease sites. The public, regulatory agencies and municipalities will have 60 days to submit written comments on proposed lease sites to the Department in response to this public notice. All comments received will be summarized and submitted to the Aquaculture Lease Board.

### *Aquaculture Lease Board:*

The County Aquaculture Lease Board will conduct a public meeting after the public notice period, at which all potential lease sites in a given application cycle will be presented for consideration from a regional perspective. The public will be given the opportunity to make comments on all potential lease sites at this meeting. Subsequent to this meeting, the Lease Board will convene and make a determination on those lease sites that will be available for leasing; those lease sites that will be conditionally eligible; and those lease sites that will be eliminated from further consideration.



*Preparation of Lease:*

The Department of Planning will then process lease applications, and lease documents will be prepared in conjunction with the Department of Law for execution, including a certified survey of the lease site. For conditionally eligible lease sites, the applicant must conduct a benthic survey to objectively determine the population density of hard clams on the lease site. If the survey documents a hard clam density of 2.0 or more legal sized hard clams per square meter, the site in question cannot be leased.





*Fees:*

For an initial lease, applicants must submit a lease application fee of \$100. An application fee is also required when applying for a lease renewal, expansion of acreage, relocation of the lease (if not required by a governmental entity), and lease subletting or assignment. An annual lease rental fee of \$200 plus \$5 per acre is required at the beginning of each year during the 10-year lease on public land. For private grant land owners, the lease rental fee would be \$200 per year during the 10-year lease.

A complete description of all aspects of the County's Shellfish Aquaculture Lease Program is contained within the "Lease Program Management Plan" document (available on the Program's website). This document also contains all administrative and procedural requirements that must be addressed by prospective lease applicants.

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## **Lease Program Benefits**

-  The County secures ownership title to approximately 100,000 acres of underwater land in Peconic Bay and Gardiners Bay. The County retains its authority to designate locations in these bays for the conduct of compatible shellfish aquaculture activities in the future.
-  Private investment in shellfish aquaculture businesses increases and shellfish farms are established at secure locations that do not pose conflicts with commercial fishermen and other bay users. This, in turn, expands the marine-based economy of Suffolk County and creates jobs that contribute to the quality of life and sense of place in East End communities.
-  The production of large numbers of oysters, hard clams and bay scallops in dense populations on shellfish farms augments the spawning potential of native shellfish populations. Increased numbers of filter feeding bivalves on shellfish farms exerts a positive influence on water quality by helping to control nutrient cycling, which in turn contributes to the prevention of noxious plankton blooms, such as brown tide. These and other ecosystem services associated with shellfish farms are provided on a sustainable basis at little to no cost to the general public.
-  Leasing is institutionalized as a Suffolk County government responsibility and function. The Lease Program is implemented using administrative mechanisms that provide for continuing input from Towns of Southold, Riverhead, Southampton, Shelter Island and East Hampton and consideration of local interests.



Steve Levy  
Suffolk County Executive

## PROGRAM DEVELOPMENT

Suffolk County  
Department of Planning  
PO Box 6100  
Hauppauge, NY 11788-0099  
(631) 853-5191

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## CONSULTANT

Cashin Associates, P.C.  
Hauppauge, New York

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## AQUACULTURE LEASE PROGRAM ADVISORY COMMITTEE

*Suffolk County Department of Planning*  
Thomas A. Isles, AICP, Chairman  
DeWitt S. Davies, PhD (Alternate)

*Suffolk County Executive Designee*  
Carrie Meek Gallagher  
Camilo Salazar (Alternate)

*Suffolk County Legislature Environment, Planning &  
Agriculture Committee*  
Hon. Jay H. Schneiderman

*Suffolk County Department of Health Services*  
Martin Trent  
Kimberly Paulsen (Alternate)

*Suffolk County Department of Public Works*  
Gilbert Anderson, PE  
Robert H. Whelan, PE (Alternate)

*Town of East Hampton*  
John Aldred

*Town of Shelter Island*  
Victor Bethge

*School of Marine & Atmospheric Sciences,  
Stony Brook University*  
David O. Conover, PhD  
William M. Wise (Alternate)

*New York State Department of Environmental Conservation*  
Vacant  
Debra A. Barnes (Alternate)

*The Nature Conservancy*  
Wayne L. Grothe

*East Hampton Town Baymen's Association, Inc.*  
Stuart Heath  
Arnold Leo (Alternate)

*Town of Riverhead*  
Lt. David Lessard

*Town of Southold*  
James McMahon

*Cornell Cooperative Extension of Suffolk County*  
Gregg Rivara  
Christopher F. Smith (Alternate)

*East End Marine Farmers Association*  
Karen Rivara

*New York Sea Grant Institute*  
Cornelia G. Schlenk

*Town of Southampton (Joint appointment)*  
Hon. Jon S. Semlear  
Hon. Edward J. Warner, Jr.



## Bourdeau, Jonathan

---

**From:** Jenkins, Josh  
**Sent:** Tuesday, June 01, 2010 5:27 PM  
**To:** Bourdeau, Jonathan  
**Subject:** FW: Fwd: Plum Island

**Josh Jenkins**  
**770.421.3412**

---

**From:** john.dugan@gsa.gov [mailto:john.dugan@gsa.gov]  
**Sent:** Tuesday, June 01, 2010 11:17 AM  
**To:** ccarrara@optonline.net  
**Cc:** phil.youngberg@gsa.gov; Jenkins, Josh  
**Subject:** Re: Fwd: Plum Island

Mr. Carrara,

Thank you very much for your comment. Please visit [www.plumislandny.com](http://www.plumislandny.com) for updates on the project.

---

John L. Dugan  
Real Property Utilization & Disposal Division  
U.S. General Services Administration  
10 Causeway Street, Room 925  
Boston, MA 02222  
Office: 617.565.5709  
Cell: 617.921.0431  
Fax: 617.565.5720

[ccarrara@optonline.net](mailto:ccarrara@optonline.net)

06/01/2010 11:13 AM

To [john.dugan@gsa.gov](mailto:john.dugan@gsa.gov)  
cc  
Subject Fwd: Plum Island

Regards,  
Chris "Birdman" Carrara  
[MailTo:CCarrara@OptOnline.net](mailto:CCarrara@OptOnline.net)  
[Mobile: 1.516.428.3219](tel:15164283219)

----- Message from ccarrara@optonline.net on Fri, 28 May 2010 20:29:15 +0000 (GMT) -----

**To:** [phil.Youngberg@gsa.gov](mailto:phil.Youngberg@gsa.gov)  
**Subject:** Plum Island



Dear Mr. Youngberg,

I am a native Long Islander, and would like to address the long term use of Plum Island if/when sold by the Federal Government / CDC.

I would like to see the island used as a marine resort island. By resort I mean a marina installed where boats could take day trips, weekend trips or week long type vacations to the island staying on their boats and touring the island which would be kept in it's current state with the exception of any contaminants and labs... removed obviously. The federal government could make a museum / Federal park out of some of the land, and turn it into a money maker, while selling or leasing the marina to a private company to maintain and operate. Simple services could be provided, deli, restaurant, bar, ice cream shop... similar to that but much less intrusive than those on Block Island.

I would LOVE to travel there, explore the island, relax on the rocky beaches and shores.... It would be a great addition to the Long Island area and would attract folks from far away.

Regards,

Chris Carrara

[MailTo:CCarrara@OptOnline.net](mailto:CCarrara@OptOnline.net)

[Mobile: 1.516.428.3219](tel:1.516.428.3219)

## Bourdeau, Jonathan

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**From:** Bourdeau, Jonathan  
**Sent:** Thursday, June 03, 2010 3:45 PM  
**To:** Parks, Rani  
**Subject:** FW: Connecticut EIS comments on Plum Island  
**Attachments:** 06-01-2010.pdf

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**From:** Jenkins, Josh  
**Sent:** Tuesday, June 01, 2010 5:26 PM  
**To:** Bourdeau, Jonathan  
**Subject:** FW: Connecticut EIS comments on Plum Island

**Josh Jenkins**  
**770.421.3412**

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**From:** john.dugan@gsa.gov [mailto:john.dugan@gsa.gov]  
**Sent:** Tuesday, June 01, 2010 5:13 PM  
**To:** Jenkins, Josh; Stelmack, Mark  
**Subject:** Fw: Connecticut EIS comments on Plum Island

Fyi

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John Dugan  
GSA Utilization & Disposal  
617.565.5709  
617.921.0431

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**From:** "Fritz, Matt" [Matt.Fritz@ct.gov]  
**Sent:** 06/01/2010 05:09 PM AST  
**To:** Philip Youngberg; John Dugan  
**Subject:** Connecticut EIS comments on Plum Island

Good afternoon Phil and John,

I have attached Connecticut's comments concerning the preparation of an EIS associated with the potential sale of Plum Island. We have also sent these comments through the mail.

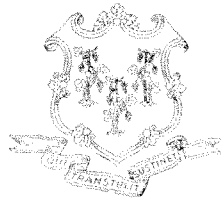
Tomorrow, I plan on sending along a note from our Governor formally requesting a briefing on the disposition of Plum Island.

If you have any questions please let me know.

Thanks.

Matt Fritz  
Special Assistant to Governor M. Jodi Rell





**M. Jodi Rell**  
GOVERNOR  
STATE OF CONNECTICUT

June 1, 2010

Phil Youngberg  
Environmental Manager  
General Services Administration  
10 Causeway Street, Room 925  
Boston, MA 02222

Dear Mr. Youngberg:

I want to thank you for the opportunity to provide comments on the draft Environmental Impact Statement (EIS) that is being prepared by the United States General Service Administration (GSA) related to the potential future sale of Plum Island, New York.

The existing Plum Island facility is located less than ten miles off of Connecticut's coast and is a relatively short distance from many population centers, both in Connecticut and New York. Plum Island is also located in Long Island Sound, one of the most important estuarine habitats in the entire country. Over the last two decades, the states of Connecticut and New York have invested billions of dollars to protect and preserve the natural resources of the Sound.

For nearly 60 years, the federal government has operated the Plum Island Animal Disease Center on the island. Prior to the opening of this important research facility, the US Army operated and maintained Fort Terry on the island as part of the nation's coastal defense system. While both uses of the island have played important roles in ensuring the safety, security and well-being of the citizens of the United States, the mission of Fort Terry has long been over and the mission of the research facility is scheduled to conclude by 2018.

Recognizing that the nation was in need of a new agricultural research facility, the Departments of Homeland Security and Agriculture initiated a process to select a site for the construction of the National Biological and Agricultural Defense Facility. Following the selection of Manhattan, Kansas as the site for the new research facility, the US Congress, through Public Law 110-329, directed GSA to sell Plum Island.

Although the new facility is not expected to be fully operational until 2018, GSA has started the process to sell the island and this scoping process and the drafting of an EIS is the first step toward the potential sale of Plum Island.

I understand that such a process can sometimes be lengthy and I can appreciate the desire to move expeditiously, however, there appear to be far too many unknowns that both limit the state's ability to provide comments through this scoping process and forestall an accurate and complete assessment of the impacts and consequences the sale of Plum Island will have on the residents of Connecticut and our region's natural resources.

One of my primary concerns is the limited information presently available to fully understand the implications of the potential sale of Plum Island. The lack of specific information – such as the disease agents and vaccines currently stored, buried and studied on the island along with the overall environmental condition of the research facility, the land surrounding the complex and Fort Terry – contribute to general concerns the state of Connecticut and, most importantly, the public have related to this sale.

In July 2008, the Department of Homeland Security enlisted the services of Booz Allen Hamilton to prepare a study to consider potential locations for the nation's new biological and agricultural defense facility. As part of this study, Homeland Security outlined, in a broad sense, issues that would need to be addressed if the Plum Island facility was to close. This study also alludes to the transition of functions from Plum Island to another, yet to be constructed facility.

Once the site in Kansas was chosen for the National Biological and Agricultural Defense Facility in 2009, the Department of Homeland Security should have initiated a process to develop a plan to transition functional capabilities and operational capacity to the new laboratory. A transition plan of this nature would have articulated the federal government's approach for appropriately ceasing laboratory operations on the island and for dealing with the aftermath of decades of research.

Specifically, the transition plan should account for: identification of the disease agents and vaccines studied and used in the laboratories; a comprehensive assessment of the environmental condition of the entire island along with consideration of clean-up strategies; options for the disposal of materials from both the research facility and remnants from past military activities; consideration of methods and routes for transporting active agents to the new facility and moving waste materials to disposal sites; and consideration of future uses for the island.

Due to the absence of a transition plan, we are faced with many unknowns concerning the future of Plum Island. The development of such a plan would have helped to inform affected parties prior to the preparation of an EIS. This sequencing would have contributed to a more comprehensive assessment and understanding of the issues associated with the future sale of Plum Island. Instead of proceeding in a logistical fashion that would have allowed for the full vetting of the many unknowns, the GSA and Homeland Security have essentially flipped the entire sequence of federal actions by proceeding with the sale of Plum Island without providing all the information necessary for state and local governments, as well as the public, to evaluate and weigh in on such critical issues as the physical condition of the island, the conditions of its sale and the plans to remove and transport active agents and/or waste materials off of the island.

However, since there may be little formal opportunity to comment on the future disposition of Plum Island, I offer the following specific comments that should be considered in developing the draft EIS:

The Plum Island site has been used for animal disease research for almost 60 years, first under the auspices of the U.S. Army Chemical Corps, then the U.S. Department of Agriculture and currently the Department of Homeland Security. Due to the nature of the activities which have been carried on at the site, the site remediation and waste disposal aspects of preparing this property for sale are the most important issues requiring analysis in this forthcoming EIS.

#### **Site and Facility Remediation**

The *Plum Island Animal Disease Center (PIADC) Facility Closure and Transition Study Final Report, July 2008*, prepared for the Department of Homeland Security by Booz Allen Hamilton states on page 4 that, "Although Resource Conservation and Recovery Act (RCRA) and Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) actions have been performed to address the majority of site-specific environmental hazards, the structures themselves may contain asbestos, lead, and potentially other hazards that would likely require abatement." On-going remediation work was also referred to at the May 19 GSA scoping public meeting in Old Saybrook, Connecticut. However, no specific information is given in the 2008 Booz Allen Hamilton report concerning the nature of the contamination occurring at the site or the extent of any clean-up efforts already completed, currently underway or planned. Furthermore, EPA's Superfund Site Information System lists the only CERCLA action at Plum Island as Preliminary Assessments conducted in 1988 and 1994 and a Facility Site Inspection Review undertaken in 2003. The site was then archived on the SSI listing. There is no evidence of any removal action having been taken to date under CERCLA.

Animal-related disease research has been conducted at Plum Island for many years. It is within the realm of possibility that residual contamination from such research could impact Connecticut or New York if such material is not handled properly. If boaters in Long Island Sound visit the island and encounter residual contamination, they could bring it back to Connecticut or Long Island. Similarly, while wildlife currently may be discouraged or prohibited from using the island, this will not always be the case. Thus, the clean-up, disposal, and/or containment of waste and contaminated materials, such as infectious residue from Foot and Mouth testing and other animal-related diseases, needs to be carried out to a degree and in a manner that future wildlife using the island cannot contact and transport any such disease. Marine mammals, sea turtles and especially shorebirds would be potential carriers for cross-LIS transport of any disease.

For these reasons of potential animal and human exposure to contamination remaining in the facilities or otherwise on the site of the Animal Disease Center, it is essential that the EIS discuss the characterization of the site for hazards and contamination, including specific buildings involved and their historic uses, and then discuss remediation which has occurred to date and the location, nature, volumes and concentrations of contaminants in the areas still to be remediated.

Plum Island also served as a defense installation for many years. As such, the potential for environmental contamination exists related to the military activities at both Fort Terry and in the vicinity of the research facility, including potentially long forgotten munitions. The EIS that is being prepared should also provide information on the extent of contamination, remediation strategies and disposal options.

Finally, the EIS will need to discuss the disposal of the removed materials including the method of removal, the destination for the removed materials, and the method of transport. It is recognized that for some of these issues, particularly those regarding disposal, alternative courses of action, as opposed to a specific finalized plan, such as identifying the disposal or treatment location, may be the necessary basis for discussion in the EIS. However, remediation and disposal issues must be covered in a sufficient level of detail and rigor to provide assurances to the public that potential hazards at the Plum Island facility have been recognized and evaluated and will be handled in such manner as to eliminate any threat to public health or wildlife, or to other resources.

To the extent that demolition materials or contaminated soils or other remediation by-products may be removed from Plum Island by water through Long Island Sound, the EIS should provide quantification of the number of barges or other vessels involved and should address any potential impacts this transport activity may have on commercial or recreational navigation, water quality and aquaculture in the Sound. In addition, identification of the potential sites (i.e., ports and harbors) sea-going vessels might utilize in transporting materials off of Plum Island should be included in the EIS.

### **Security**

Plum Island today and potentially into the future poses a number of security challenges. These challenges could diminish over time once the new laboratory is constructed and operations cease on the island.

However, the security concerns associated with the future disposition of the island are real and should be incorporated and explored in developing the EIS. In particular, the EIS should outline the measures that will be in place to prevent the spread of disease to livestock and poultry during the transporting of active agents from the island. The EIS should identify the strategies that will be employed to assure foreign animal disease agents, such as Foot and Mouth Disease virus, will be protected from terrorists. In the consideration of disposal options, the EIS should consider security ramifications associated with disposing of materials on site – especially disease agents – and what protections will be in place to ensure such disposal sites are not disturbed.

In addition, until remediation and transition activities are completed security will need to be maintained to deny intentional or unintentional access to the island by unauthorized persons for their own safety.

Further, the new owner(s) should be required to provide security for the island as a condition of sale – ensuring that whatever remains on the island is not disturbed.

### **Shorebird Resources of Plum Island**

Plum Island is one of 33 Long Island Sound Stewardship Areas designated pursuant to the Long Island Sound Stewardship Act of 2005. The purpose of the Stewardship Act is to identify, protect, and enhance upland sites possessing significant ecological, educational, open space, public access or recreational value within the Long Island Sound ecosystem. Plum Island is recognized for the significant ecological value of its colonial waterbird habitat (it hosts the second largest breeding population of roseate terns in North America) and its small, rocky islets dominated by grassy and herbaceous vegetation.

Plum Island has also been identified by Audubon New York as one of 136 designated Important Bird Areas (IBAs) in the state of New York. At-risk species using Plum Island include piping plover, common tern and least tern. Species congregations of interest include common and roseate tern. The site also meets the criterion for winter waterfowl congregation.

Over the years, Plum Island has supported between one and eight pairs of piping plovers annually and two to 108 pairs of least terns. Piping plovers are a Connecticut and federally listed threatened species; least terns are also listed as a threatened species in Connecticut. Both of these species make up a regional population that does not recognize state boundaries and uses Connecticut's and Long Island's shoreline, as well as surrounding islands, to nest. So it is possible that the piping plovers and least terns that have nested on Plum Island may also have nested in Connecticut. Neither of these species is banded, so it is difficult to say this with certainty. Both of these species are nesting in the area from March to August and are usually nesting together on a sandy beach habitat. The EIS should identify the specific areas on Plum Island that are used as nesting habitat, and such areas should be protected during the nesting season from equipment used in demolition or remediation. The sandy beach areas used by these species should be protected from contamination and not be used as staging areas for any contaminated materials that are to be transported.

### **Fisheries Significance of Plum Island and Vicinity**

Many species of finfish found in Long Island Sound undergo seasonal migrations along the Atlantic coast. The area between Orient Point and Fishers Island Sound, which encompasses Plum Island, is the primary migratory corridor for these species. This area is also an important feeding area for finfish, and the varied bathymetry and bottom supports populations of a number of resident species. As a result, the area is one of the most productive recreational and commercial fishing places in LIS and Block Island Sound. Connecticut anglers fish for all of the five most popular recreational species found in Long Island Sound: bluefish, striped bass, scup, blackfish and summer flounder. Charter boat and party boat operators also take their clients to this area for quality fishing experiences.



In addition to finfish, the area is currently the most productive commercial lobster fishing area in Long Island Sound. Following the LIS lobster dieoff in 1999, eastern LIS accounts for about sixty-percent of Connecticut's 2009 lobster landings. In that year, eastern LIS lobster landings amounted to over 461,000 pounds with a dock side value of about \$1.98 million. Though economic data specific to Long Island Sound or the Plum Island area is not available, economic analysis from NOAA (2010) indicates that for Connecticut as a whole, Connecticut 2008 commercial fishing industry (from LIS and offshore) accounted for 4,416 jobs, about \$126 million in income and about \$236 million in sales.

Similarly, NOAA analysis for recreational fisheries indicates that in 2008, Connecticut marine recreational fishing accounted for about \$693 million in durable equipment expenditures and about \$50 million on expenditures on fishing trips. Due to the importance of this area to Connecticut's commercial and recreational fishers, it is important that any cleanup operations minimize interference with commercial and recreational fishing activities and eliminate the possibility of contaminated runoff or groundwater entering the marine environment. Any materials on Plum Island that could contaminate the aquatic environment must be adequately contained while remediation efforts proceed and must be completely removed.

### **Sea Turtle Resources**

Connecticut and New York have four species of sea turtles that visit Long Island Sound but do not nest or lay eggs here. These consist of two Connecticut and federally endangered species, leatherback and Atlantic Ridley turtles, and the two Connecticut and federally threatened species, loggerhead and Atlantic green turtles. While traditionally thought of as tropical animals, sea turtles do frequent the northern temperate latitudes, including Long Island Sound, during the summer months. The northeast may also be development habitat for juvenile loggerheads and Atlantic Ridleys. However, overall the life history of sea turtles is poorly understood, especially for the early development stages of their lives. As with fisheries, it is important that any residual materials from disease research on Plum Island that could contaminate the aquatic environment be completely removed to avoid contact with and transport by sea turtles.

Similarly, seals that use Plum Island and the small rocky islets off its coast travel the Sound and are frequently spotted along Connecticut's shoreline. These species contribute to the diversity of Connecticut's wildlife community and would be subject to the same concerns cited above for sea turtles.

### **Connecticut Coastal Management Act Considerations**

According to the scoping meeting briefing paper, “Supporting information states that proposed future uses would be subject to ...state environmental...approvals and regulations.” It should be recognized in the EIS that this would include adherence to the Connecticut Coastal Management Act (CCMA) and all relevant policies thereof. While Plum Island is located within the New York portion of Long Island Sound, its proximity to Connecticut state waters and its existing maritime connection to the Connecticut shoreline communities demonstrate its influence on this state’s coastal zone. Consequently, when GSA elects to proceed with the Plum Island sale, it shall be considered by the Connecticut Office of Long Island Sound Programs to be a Federal activity subject to Federal consistency review under Section 307(c)(1) of the Coastal Zone Management Act of 1972, as amended, Subpart C of Code of Federal Regulations (CFR) Part 930, and Section II Part VII(c) of the State of Connecticut Coastal Management Program and Final Environmental Impact Statement. Relative to this, Connecticut’s Federal Consistency List, approved by the National Oceanic and Atmospheric Administration’s Office of Ocean and Coastal Resource Management (NOAA-OCRM) lists the disposal of land pursuant to the Property Act (40 USC 101) as amended, by the GSA as subject to Federal consistency review.

The CCMA contains a number of policies pertinent to this action. The EIS will need to evaluate the remediation and disposal of the Plum Island property for consistency with these policies. The following policies, in particular, from the CCMA would apply to the proposed action.

**Adverse Impacts Policy** prohibits: Degrading water quality through the significant introduction into either coastal waters or groundwater supplies of suspended solids, nutrients, toxics, heavy metals or pathogens...Connecticut General Statutes (CGS) section 22a-93(15)(A)

**Coastal Resource Policies** declare that: “the pollution of the waters of the state is inimical to the public health, safety and welfare of the inhabitants of the state, is a public nuisance and is harmful to wildlife, fish and aquatic life...[CGS section 22a-422, as referenced by CGS section 22a-92(a)(2)] and require the management of “...estuarine embayments so as to insure that coastal uses proceed in a manner that assures sustained biological productivity, the maintenance of healthy marine populations...”[CGS section 22a-92(c)(2)(A)].

**Coastal Use Policies** require minimization of “...the risk of oil and chemical spills at port facilities” [CGS section 22a-92(b)(1)(C)], as well as “...safe and sanitary disposal of toxic or hazardous wastes...”[CGS 22a-220(a)].

Pertinent to these policies, I am concerned that the numerous documented living resources could be adversely affected if remediation conducted in association with the sale of Plum Island is not carried out in the most prudent and environmentally sound manner. Sources of concern include, but are not limited to, insufficient site management practices during deconstruction and the potential discharge of petroleum products from barges or other vessels employed during remediation activities that may transit or berth in Connecticut waters. Adverse impacts to living resources and habitats can also be expected to result from the development of the island subsequent to its sale.

The CCMA also includes policies mandating the preservation of water-dependent uses, defined as "...uses and facilities which require direct access to, or location in, marine or tidal waters." [CGS section 22a-93(16)] There presently exists an established water-dependent use related to the operation of Plum Island, i.e., the maritime transportation service that ferries site workers from Old Saybrook to Plum Island. Although that service does not presently benefit the general public, the state is interested in preserving that use, if appropriate, relative to the future use of the island. Abandonment of that water-dependent use would be inconsistent with the CCMA.

### **Disposal (Sale) of Plum Island Property**

The scoping notice discusses the limitation upon the EIS process arising from the uncertainty as to the ultimate ownership and reuse of Plum Island and the ferry terminal and support facility on Orient Point. Current requirements for disposal, as contained in Section 540 of Public Law 110-329, appear to require the sale of the property as opposed to allowing for its transfer to another Federal agency or to the State of New York for conservation or recreation purposes. However, given the habitat value of the island, its designation as a Long Island Sound Stewardship Area and an Important Bird Area, the undeveloped nature of the majority of the island, and the limitations on access to the site, conservation of the island as a wildlife preserve or as a park supporting low intensity recreation would be appropriate and desirable uses for this property. In point of fact, the Long Island Sound Stewardship Act is equivalent federal statutory authority to that authorizing the sale of Plum Island. To sell the entire island without significant conservation restrictions would violate both the letter and the spirit of both the Stewardship Act and the National Estuary Program, through which the Long Island Sound Study was established.

However, if the property is to be sold, the EIS should thoroughly document the disposal process and should discuss alternative frameworks for the disposal. For instance, the simplest process from an administrative perspective would be to sell the island in its entirety to a single purchaser. However, this would limit the pool of potential purchasers and would likely price Plum Island out of the reach of entities who would want to acquire it for conservation purposes. Connecticut strongly advocates that the EIS should evaluate the disposal of the Plum Island property in a fashion allowing for the acquisition of portions of the island with the greatest conservation value via separate transactions. In particular, under this scenario, I would advise offering for private sale only the portion(s) of the island presently developed and occupied (approximately 10%), while preserving the remaining, undeveloped acreage as natural habitat. This may allow conservation organizations or state or local governmental entities, individually or collectively, to purchase specific areas of the island which support the highest concentration of shorebird nesting activity, marine mammal use or sea turtle visitation at prices that would be more affordable than the purchase of the island as a whole. The identification and selection of the areas of Plum Island that would be the most appropriate for such separate sale(s) should be discussed in the EIS, preferably in specific terms, but at least in a conceptual fashion with an agency commitment to provide for such options.

In the event that preservation of the entire undeveloped portion of the island is not feasible, the EIS should also evaluate appropriate conservation easements for the portions of Plum Island most heavily used by piping plovers, least terns, roseate terns and other appropriate species, as well as habitats of endangered or threatened plants. Such restrictions could apply to any portion of the island which would potentially be subject to development after disposal.

The potential need for two additional types of re-use restrictions should also be discussed in the EIS. If the remediation of the site results in any areas of contaminated soil being capped as a protective measure to prevent exposure to humans or wildlife from hazardous materials left in place, restrictions on the development of these areas would likely be required. Also, any restrictions arising from the preservation of historic resources at Fort Terry should be detailed in the EIS.

In addition to land use restrictions, the EIS should evaluate the potential impacts associated with the future development of the island in terms of the need for expanded utility service and increased boat traffic. These types of activities could impact resources on the island and in the waters offshore, such as sensitive shellfish beds that could potentially be impacted by the installation of new electrical lines.

#### **Schedule for EIS Development**

The scoping notice sets out a very ambitious timeframe for the development of the EIS, with a draft EIS available for review this summer. Based on past experience, this timeframe is likely to be unrealistic even were all the constituent pieces of the EIS available from previous studies. However, items such as the development of a site remediation plan and an assessment of the flora and fauna of the island, particularly the delineation of areas which are used for shorebird nesting or for other seasonal functions, will likely prove to require a longer timeframe to develop. The recent project timeframe presented at the scoping meetings stated that the Plum Island Animal Disease Center would remain open until 2018 (the earliest date that the new lab in Manhattan, Kansas could be ready). This should remove any time pressure which may have led to the formulation of such a compressed timeframe for EIS development. The accuracy of the EIS could be called into question with such a rushed schedule, and most certainly the thoroughness of the document will be affected. In addition, GSA's ability to consider and incorporate any input received through the public scoping process on such short notice is questionable. I urge GSA to take the time necessary to develop an EIS which properly addresses site resources, remediation needs and methodology, and alternatives for property disposal.

#### **Conclusion**

As evidenced by the length of this response, there are many open questions concerning the future disposition of Plum Island. While I respect the process that has been initiated, I feel the sequence of events associated with this federal action contributes to the many unknowns that remain concerning this property.

As we all know, this property and the operations that are conducted there present unique challenges and this sale cannot be treated or handled in a routine manner. I believe GSA should proceed at a cautious, but reasonable pace in determining the future of this island.

I also view this process as a great opportunity – a chance to fully explore the future and full potential of Plum Island as a natural asset worth preserving. While I understand that Congress has called for the sale of this island, I believe we should use the process initiated by GSA as an opportunity to highlight the tremendous natural resources on and around this island and work toward a creative approach to preserve these resources while dealing with the island's research legacy in an appropriate manner.

Thank you, again, for this opportunity to comment on the behalf of the state of Connecticut and its citizens. My office stands prepared to assist with any clarification or provide further details, if necessary. Please contact Matthew Fritz of my staff at (860) 524-7309 if you have questions or wish to follow up on the comments we have submitted.

Sincerely,

A handwritten signature in cursive script that reads "M. Jodi Rell". The signature is written in dark ink and is positioned below the word "Sincerely,".

M. Jodi Rell  
Governor

cc: John Dugan, GSA

## Parks, Rani

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**From:** Bourdeau, Jonathan  
**Sent:** Thursday, June 03, 2010 3:35 PM  
**To:** Parks, Rani  
**Subject:** FW: Comments on Plum Island DEIS  
**Attachments:** Scoping Letter-DEIS-Plum Island.doc

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**From:** Jenkins, Josh  
**Sent:** Wednesday, June 02, 2010 10:49 AM  
**To:** Bourdeau, Jonathan  
**Subject:** FW: Comments on Plum Island DEIS

FYI

**Josh Jenkins**  
**770.421.3412**

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**From:** john.dugan@gsa.gov [mailto:john.dugan@gsa.gov]  
**Sent:** Wednesday, June 02, 2010 10:42 AM  
**To:** Jenkins, Josh; Stelmack, Mark  
**Cc:** phil.youngberg@gsa.gov  
**Subject:** Fw: Comments on Plum Island DEIS

FYI

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John L. Dugan  
Real Property Utilization & Disposal Division  
U.S. General Services Administration  
10 Causeway Street, Room 925  
Boston, MA 02222  
Office: 617.565.5709  
Cell: 617.921.0431  
Fax: 617.565.5720

----- Forwarded by John L. Dugan/1P/R01/GSA/GOV on 06/02/2010 10:41 AM -----

[redknot@optonline.net](mailto:redknot@optonline.net)

06/02/2010 10:39 AM

To "Dugan, John" <[john.dugan@gsa.gov](mailto:john.dugan@gsa.gov)>

cc Kevin McAllister <[mac@peconicbaykeeper.org](mailto:mac@peconicbaykeeper.org)>, Pat Paladines  
<[ppaladines@optonline.net](mailto:ppaladines@optonline.net)>, Stella Miller <[trickiwoo63@yahoo.com](mailto:trickiwoo63@yahoo.com)>, Bob DeLuca  
<[bdeluca@eastendenvironment.org](mailto:bdeluca@eastendenvironment.org)>, "Bottini, Mike" <[mike@peconic.org](mailto:mike@peconic.org)>, carl safina  
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Lamont <[elamont@optonline.net](mailto:elamont@optonline.net)>

Subject Comments on Plum Island DEIS

Dear Mr. Youngberg: Attached please find a letter from the Preserve Plum Island Coalition regarding the above-referenced topic.

A signed copy of the letter and a copy of the case statement has been mailed to you and

you should receive it shortly.

The Coalition appreciates the opportunity to provide the comments to you.

I would appreciate it if you would please acknowledge receipt of this e-mail.

Thank you.

Sincerely,

John Turner

May 28, 2010

Mr. Phil Youngberg  
c/o John Dugan  
General Services Administration  
10 Causeway Street  
Room 925  
Boston, MA 02222

R.E.: Comments on the Scope for the Draft Environmental Impact Statement for the Public Sale of Plum Island, New York

Dear Mr. Youngberg:

The Preserve Plum Island Coalition ("Coalition"), consisting of a group of several dozen concerned individuals, scientists, and conservation, environmental, planning, and civic organizations, appreciates the opportunity to provide comments on the above-referenced matter. We ask that these comments be included in the formal record that is produced for this scoping document.

The Coalition was formed in response to the proposed sale of Plum Island, as provided for in Section 540 of the Consolidated Security, Disaster Assistance, and Continuing Appropriations Act of 2009. While we recognize the sale of the Island is outside of your agency's purview and does not directly bear upon the issue of the scoping document, the Coalition would like to take the opportunity to express its strong opposition to the proposed sale of the Plum Island to the private sector. In our view the much preferred outcome for the Island, either all or in substantial part, is as a National Wildlife Refuge administered by the U.S. Fish and Wildlife Service. The rationale for this alternative is detailed in a document the Coalition has prepared - "The Case for Preserving Plum Island", a copy of which is enclosed for your review (in the mail).

As you can see from the case statement, Plum Island possesses significant ecological, environmental, historic and scenic, and recreational value. The island and the coastal waters immediately surrounding it provide habitat for more than 100 species of migratory songbirds, shorebirds, waterfowl and other avian groups. Piping plovers (a federally threatened species) nest here and Roseate Terns (federally endangered species) also occur here, the young appear to use it as developmental habitat. The largest haul-out site for seals, particularly harbor and grey seals, in southern New England is situated in the southeastern section of the Island. There is a NY Natural Heritage ranked natural community (Maritime dune) and a large, high-quality freshwater wetland situated in the southeastern portion of the Island. Several rare plants occur on Plum Island including carnivorous species, orchids, and species found in beach



habitats. By its very essence and nature Plum Island possesses outstanding recreational potential and scenic quality.

Ironically, these values have been recognized by the federal government. Plum Island is situated between two estuaries which have gotten national recognition - the Peconic Estuary and the Long Island Sound. Both have received significant funding to develop and implement management strategies designed to restore these systems to ecological health.

There are two specific subject areas that we respectfully request be included, discussed, and assessed in the DEIS. As described in more detail below, they are a comprehensive ecological inventory and disposition alternatives which achieve an open space/conservation outcome.

### Ecological/Natural Resources Inventory and Impact Analysis

It is imperative that the DEIS provide an up-to-date and comprehensive description and delineation of the plant and animal species, vegetation, and natural communities that occur on Plum Island and its nearshore waters. This delineation should include a full and complete description of the natural communities which make up the island including their structure, function (e.g. stopover habitat for migratory birds or provides breeding habitat for piping plovers), species composition, and their distribution, extent, and location on the island. The NY Natural Heritage ranked Maritime Dune community should be delineated. Similarly, the DEIS should list and describe all known plant and animal species that are known to occur on Plum Island, in terms of their location, abundance, and community preference. This detailed ecological inventory should take place over a full calendar year to ensure, to the greatest extent possible, it is comprehensive and complete. In addition to actual inventory field work undertaken by consultants hired by GSA, the agency should utilize existing ecological information that has been previously developed and or published including data from, but not limited to, the Riverhead Foundation for Marine Research and Preservation, the NY Natural Heritage program, and the National Audubon Society. Furthermore, the statement, in presenting and comparing the various alternatives, should describe and assess the actual and/or foreseeable adverse impacts development on the Island might have on these species and communities and their ecological function and value.

### Alternatives

The DEIS should include a reasonable range of alternatives regarding the disposition and use of Plum Island. The Coalition specifically requests that the DEIS assess the following two alternatives: 1) selling the entire island for open space conservation purposes and 2) selling the buildings and associated infrastructure, currently part of the Plum Island Animal Disease Control facility and the 10-15% of the land surrounding these buildings, to an institution for some type of research or academic use and the

remaining 85-90% for open space conservation purposes. These uses would clearly allow for the GSA to fulfill its Congressional mandate but in a manner that safeguards the Island's significant ecological resources.

I appreciate the opportunity to provide these comments on behalf of the Preserve Plum Island Coalition and look forward to reviewing the Draft Environmental Impact Statement when it is completed.

Sincerely,

John L. Turner  
(for the Preserve Plum Island Coalition)

cc: Preserve Plum Island Coalition members

## Bourdeau, Jonathan

---

**From:** john.dugan@gsa.gov  
**Sent:** Wednesday, June 02, 2010 4:01 PM  
**To:** Jenkins, Josh; Stelmack, Mark  
**Cc:** phil.youngberg@gsa.gov  
**Subject:** Fw: Plum Island  
**Attachments:** Document.pdf

From EPA Region One

---

John L. Dugan  
Real Property Utilization & Disposal Division  
U.S. General Services Administration  
10 Causeway Street, Room 925  
Boston, MA 02222  
Office: 617.565.5709  
Cell: 617.921.0431  
Fax: 617.565.5720

----- Forwarded by John L. Dugan/1P/R01/GSA/GOV on 06/02/2010 04:01 PM -----

"Krasauskis, Carol" <[Krasauskis.Carol@epa.gov](mailto:Krasauskis.Carol@epa.gov)>

To "[JOHN.dugan@gsa.gov](mailto:JOHN.dugan@gsa.gov)" <[JOHN.dugan@gsa.gov](mailto:JOHN.dugan@gsa.gov)>

cc "HUNTER, JOHANNA" <[Hunter.Johanna@epa.gov](mailto:Hunter.Johanna@epa.gov)>

Subject Plum Island

06/02/2010 03:53 PM

Please open the attached document. This document was digitally sent to you using an HP Digital Sending device.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 1

Boston, Massachusetts

REGION 2

New York, New York

Office of the Regional Administrators

June 2, 2010

Mr. Phil Youngberg, Environmental Manager  
c/o Mr. John Dugan  
General Services Administration (GSA)  
10 Causeway Street  
Room 925  
Boston, MA 02222

Dear Mr. Youngberg:

This letter is in regard to the Environmental Impact Statement being prepared by the General Services Administration to analyze and address issues that may be identified on the sale of the 840 acre Plum Island, New York. The U.S. Department of Homeland Security (DHS), in cooperation with the U.S. Department of Agriculture (USDA), operates the Plum Island Animal Disease Center (PIADC) on the island. The Consolidated Security, Disaster Assistance, and Continuing Appropriations Act of 2009 mandates the sale of the Island as a result of the determination by DHS to construct and operate a new facility in Manhattan, Kansas and move its operations from Plum Island.

On September 28, 2006, the Environmental Protection Agency joined the Connecticut Department of Environmental Protection and the New York State Department of Environmental Conservation in designating the Plum and Gull Islands complex one of thirty-three inaugural Long Island Sound Stewardship Areas (enclosure 1). The areas were identified through the Long Island Sound Study Stewardship Initiative (<http://longislandsoundstudy.net/issues-actions/stewardship/>). The designation highlighted the areas of Long Island Sound with the richest recreational and ecological resources, and established a goal of raising awareness of the threats to these resources and facilitating on-the-ground stewardship actions through coordinated resource planning. Later in 2006, Congress passed the Long Island Sound Stewardship Act (P.L. 109-359), which underscored the importance of protecting and preserving critical habitat areas along our shorelines.

Plum Island was cited as a Stewardship Area because of its exemplary colonial waterbird habitat. Its undeveloped and diversely vegetated shoreline supports the second largest breeding population of roseate terns, a federally endangered species, and several hundred Common Terns, a NYS threatened species. Audubon New York has designated Plum Island as an Important Bird Area. To better document bird usage, surveys were conducted over the past three years during the breeding, winter, and migration seasons. More than 100 bird species have been documented on Plum Island and adjacent coastal waters. In 2009, seven active Osprey nests and an active Bank Swallow colony, a bird species on the decline in New York, were noted. Piping

Plovers, a federally threatened species, use the shoreline habitat for breeding and foraging. In addition, the U.S. Fish and Wildlife Service highlighted Plum Island in a 1991 report as a significant coastal habitat (*Final Report of the Northeast Coastal Areas Study: Significant Coastal Habitats of Southern New England and Portions of Long Island, New York*).

We believe that the EIS for Plum Island should further evaluate the ecological importance of this property through an inventory and assessment of its natural resource values and ecological functions, and analyze opportunities for balanced and appropriate public uses. Any potential contamination threats to public health and the environment associated with the existing disease research facility should also be evaluated along with appropriate remediation or removal actions.

We recommend that the EIS include as an alternative the permanent protection of the entire undeveloped portion of the property, while allowing the developed portion to be sold to the highest bidder for appropriate future commercial or other development uses consistent with conservation and stewardship goals for Long Island Sound. We would also expect the EIS to address air and water quality impacts of the development and conservation alternatives under consideration, including the potential for wetland impacts and the need for drinking water and wastewater facilities associated with future development that may occur. Moreover, any development alternative considered for the facility should consider the potential to implement green construction and operations principles as outlined in enclosure 2. If the potential for development on the island is uncertain the EIS should consider a range of potential development scenarios and associated environmental impacts and mitigation opportunities for each scenario.

In addition, public access to Plum Island should be provided by reserving some form of public access rights from the associated Orient Point nine and one half acre parcel that currently includes buildings, utilities, and ferry docking facilities that support the Plum Island research facility. This overall approach would support the public interest noted in the designation of Plum Island as an inaugural Long Island Sound Stewardship Area.

We believe that the future of Plum Island must be decided with due consideration to the full spectrum of public interest, including existing federal and state conservation policies and interests. We request the opportunity to review a draft of the EIS scope before it is finalized and are willing to discuss our comments at your convenience as necessary. Beyond this, we would welcome the opportunity to serve as cooperating agency on development of the EIS. Should you have any questions or wish to discuss our concerns, please contact Ms. Grace Musumeci, Chief of EPA Region 2's Environmental Review Section, at 212-637-3738.

  
Judith A. Enck, Regional Administrator  
EPA Region 2

  
H. Curtis Spalding, Regional Administrator  
EPA New England

Enclosures



**RESOLUTION  
OF THE  
LONG ISLAND SOUND STUDY  
POLICY COMMITTEE  
CONCERNING  
LONG ISLAND SOUND STEWARDSHIP**

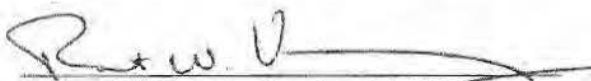
**W**hereas, Long Island Sound is recognized as a National treasure of great cultural, environmental, ecological, and economic importance; and

**W**hereas, as a highly urbanized estuary, the Long Island Sound ecosystem is under stress from both sustained human uses as well as emerging global and regional environmental conditions; and

**W**hereas, the *Comprehensive Conservation and Management Plan* for Long Island Sound calls for creation of a system to identify areas of land and water of outstanding or exemplary scientific, educational, or biological value for protection, management or acquisition; and

**W**hereas, at the direction of the Policy Committee under the Long Island Sound 2003 Agreement, the Long Island Sound Study Management Committee has worked to identify key areas in the Long Island Sound watershed that reflect regional differentiation, a variety of ecosystems and significant natural habitats found in the Sound, and public access to this magnificent body of water;

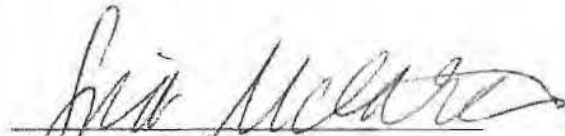
**N**OW THEREFORE BE IT RESOLVED THAT, the Long Island Sound Study Policy Committee, assembled in Rye, New York on September 28, 2006, hereby endorses the work of the Management Committee in recommending thirty-three inaugural Stewardship areas, and hereby adopts them as part of the Long Island Sound Stewardship Initiative.



Robert W. Varney, Regional Administrator  
US Environmental Protection Agency  
New England Region



Alan J. Steinberg, Regional Administrator  
US Environmental Protection Agency  
Region II



Gina McCarthy, Commissioner  
Connecticut Department of  
Environmental Protection



Denise M. Sheehan, Commissioner  
New York State Department of  
Environmental Conservation

## EPA Region 2 Green Project Recommendations and Resources

EPA strongly encourages that the concepts outlined below be considered by those receiving federal grant assistance for water, wastewater, stormwater, or water quality protection projects. In this regard, project sponsors are encouraged to use local and/or recycled materials; to recycle materials generated onsite; to utilize low-emissions technologies and fuels; and to incorporate renewable-energy (e.g., solar, wind, geothermal, biogas, and biomass) and energy-efficient and environmentally sustainable technology in project design, construction, and operation.

- **Utilize Clean Diesel Technology** <http://www.epa.gov/otaq/diesel/>

Diesel controls, cleaner fuel, and cleaner construction practices can be utilized for both on-road and off-road equipment used for transportation, excavation, and other construction activities.

Particular consideration should be given to the following concepts:

- 1) Strategies and technologies to reduce unnecessary idling, including auxiliary power units, the use of electric equipment, and establishing and enforcing limits on idling time.
- 2) The use of ultra low sulfur diesel fuel in non-road applications.
- 3) The use of add-on control technologies like diesel oxidation catalysts and particulate filters, repowering, or newer, cleaner diesel equipment.

<http://www.mass.gov/dep/air/diesel/connetro.pdf>

- 4) Contract specifications can be used to require contractors to use advanced pollution controls and clean fuels. <http://www.epa.gov/diesel/construction/contract-lang.htm>. A model specification is available online at <http://www.northeastdiesel.org/pdf/NEDC-Construction-Contract-Spec.pdf>.

- **Use Alternative and Renewable Energy**

The U.S. Department of Energy's "Green Power Network" (GPN) provides information and markets that can be used to supply alternative generated electricity. The following link identifies several suppliers of renewable energy.

[http://apps3.eere.energy.gov/greenpower/buying/buying\\_power.shtml](http://apps3.eere.energy.gov/greenpower/buying/buying_power.shtml)

- **Incorporate onsite energy generation and energy efficient equipment upgrades into projects at drinking water and wastewater treatment facilities**

Promote the use of captured biogas in combined heat and power systems and/or renewable energy (wind, solar, etc.) to generate energy for use onsite as well as upgrades to more energy efficient equipment (pumps, motors, etc.).

[http://www.epa.gov/waterinfrastructure/bettermanagement\\_energy.html](http://www.epa.gov/waterinfrastructure/bettermanagement_energy.html)

- **Utilize Energy Star/Multi-media building and land design practices**

Consideration should be given to including building practices which have multi-media benefits, including energy efficiency, water conservation, and healthy indoor air quality. Apply building rating systems and tools, such as Energy Star, Energy Star Indoor Air Package, and Water Sense for building construction. [http://www.energystar.gov/index.cfm?c=business.bus\\_bldgs](http://www.energystar.gov/index.cfm?c=business.bus_bldgs) and

<http://www.usgbc.org/>

- **Implement Water Efficiency**

Water efficiency can make infrastructure systems more sustainable by reducing the quantity of water treated and distributed through the water supply system, and subsequently by the wastewater treatment and disposal systems. EPA is promoting water use practices that increase efficiency, eliminate waste, and conserve water resources, resulting in a decreased burden on our water resources. The WaterSense program, <http://www.epa.gov/watersense>, promotes the market for water-efficient products through the use of WaterSense-labeled products and the use of contractors certified through a WaterSense-labeled program. Water supply utilities can also decrease the burden on water and wastewater treatment systems by reducing the amount of drinking water lost from their leaking water distribution pipes. Additional details on the Sustainable Infrastructure Initiative can be found at <http://www.epa.gov/waterinfrastructure>.

- **Source Management for Stormwater Runoff**

Green infrastructure and low impact development approaches can reduce, capture, and treat stormwater runoff at its source. Site-specific practices, such as green roofs, downspout disconnections, rain harvesting/gardens, planter boxes, and porous pavements are designed to mimic natural hydrologic functions and decrease the amount of impervious area and stormwater runoff. Preserving and recreating natural landscape features can create functional and appealing site drainage that treats storm water as a resource rather than a waste product.

<http://www.epa.gov/nps/lid>, and

<http://cfpub.epa.gov/npdes/greeninfrastructure/technology.cfm>

- **Encourage cost-efficient, environmentally-friendly landscaping**

EPA's GreenScapes program provides cost-efficient and environmentally friendly solutions for landscaping. Designed to help preserve natural resources and prevent waste and pollution, GreenScapes encourages companies, government agencies, other entities, and homeowners to make holistic decisions regarding waste generation and disposal and the associated impacts on land, water, air, and energy use. <http://www.epa.gov/osw/conservation/rrr/greenscapes/index.htm>

- **Use recycled materials in highway and construction projects.**

Many industrial and construction byproducts are suitable and available for use in road or infrastructure construction. <http://www.epa.gov/osw/conservation/rrr/imr/index.htm> Use of these materials can save money and reduce environmental impact. The Recycled Materials Resource Center has user guidelines and specifications for recycled material.

<http://www.recycledmaterials.org/tools/uguidelines/index.asp>.

- **Safely Reuse and/or Recycle Project-related Debris and Waste**

The *Federal Green Construction Guide for Specifiers* includes a construction waste management specification. <http://www.wbdg.org/design/greenspec.php>

- **Utilize environmentally preferable purchasing**

Promote markets for environmentally preferable products by referencing EPA's multi-attribute Environmentally Preferable Purchasing guidance. <http://www.epa.gov/epp>



## Bourdeau, Jonathan

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**From:** john.dugan@gsa.gov  
**Sent:** Wednesday, June 02, 2010 4:44 PM  
**To:** Jenkins, Josh; Stelmack, Mark  
**Cc:** phil.youngberg@gsa.gov  
**Subject:** Fw: Plum Island Scoping Comments of CFE/Save the Sound  
**Attachments:** Stewardship\_Atlas06.pdf; Stewardship\_Resolution06.pdf; 2003 Long Island Sound Agreement « Long Island Sound Study.mht; CFE-STS Plum Island scoping comments.docx

FYI

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John L. Dugan  
Real Property Utilization & Disposal Division  
U.S. General Services Administration  
10 Causeway Street, Room 925  
Boston, MA 02222  
Office: 617.565.5709  
Cell: 617.921.0431  
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----- Forwarded by John L. Dugan/1P/R01/GSA/GOV on 06/02/2010 04:43 PM -----

Curt Johnson <[cjohnson@cfenv.org](mailto:cjohnson@cfenv.org)>

06/02/2010 04:42 PM

To "[john.dugan@gsa.gov](mailto:john.dugan@gsa.gov)" <[john.dugan@gsa.gov](mailto:john.dugan@gsa.gov)>

cc Roger Reynolds <[rreynolds@cfenv.org](mailto:rreynolds@cfenv.org)>, Leah Schmalz  
<[lschmalz@savethesound.org](mailto:lschmalz@savethesound.org)>, Don Strait <[dstrait@cfenv.org](mailto:dstrait@cfenv.org)>

Subject Plum Island Scoping Comments of CFE/Save the Sound

Dear Mr. Dugan,

On behalf of CFE/Save the Sound I request that the attached scoping letter and relevant attachments to that letter be included in the record of the EIS your office is preparing associated with the proposed sale of Plum Island, New York. Many thanks,

Curt Johnson  
Director of Programs and Senior Attorney  
Connecticut Fund for the Environment  
(203)787-0646/ext. 111

Leadership  
Expertise  
Connection  
Results

In protecting the environment of the Long Island Sound region.

## Parks, Rani

---

**From:** john.dugan@gsa.gov  
**Sent:** Wednesday, June 02, 2010 4:56 PM  
**To:** Jenkins, Josh; Stelmack, Mark  
**Cc:** phil.youngberg@gsa.gov  
**Subject:** Fw: CFE/STS comment letter signed attached  
**Attachments:** CFE-STS Plum Island scoping comment signed.pdf

FYI... again

---

John L. Dugan  
Real Property Utilization & Disposal Division  
U.S. General Services Administration  
10 Causeway Street, Room 925  
Boston, MA 02222  
Office: 617.565.5709  
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----- Forwarded by John L. Dugan/1P/R01/GSA/GOV on 06/02/2010 04:55 PM -----

Curt Johnson <[cjohnson@cfenv.org](mailto:cjohnson@cfenv.org)>

06/02/2010 04:54 PM

To "[john.dugan@gsa.gov](mailto:john.dugan@gsa.gov)" <[john.dugan@gsa.gov](mailto:john.dugan@gsa.gov)>  
cc Roger Reynolds <[rreynolds@cfenv.org](mailto:rreynolds@cfenv.org)>, Leah Schmalz  
<[lschmalz@savethesound.org](mailto:lschmalz@savethesound.org)>, Don Strait <[dstrait@cfenv.org](mailto:dstrait@cfenv.org)>  
Subject CFE/STS comment letter signed attached

Dear Mr. Dugan,

I have attached a signed version of the CFE/STS comment letter sent to your attention a few minutes ago. Please use this signed letter for the EIS record. Many thanks,

Curt Johnson  
Director of Programs and Senior Attorney  
Connecticut Fund for the Environment  
(203)787-0646/ext. 111

Leadership  
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June 2, 2010

VIA Electronic Mail Attachment

Mr. Phil Youngberg, Environmental Manager  
C/o Mr. John Dugan  
General Services Administration (GSA)  
10 Causeway Street, Room 925  
Boston, MA 02222  
(email: [john.dugan@gsa.gov](mailto:john.dugan@gsa.gov) // facsimile: 616 565 5720)

Re: Scoping Comments regarding the EIS of a proposed Sale of Plum Island, NY.

Dear Mssrs. Youngberg and Dugan:

On behalf of the Connecticut Fund for the Environment, Inc., and our program Save the Sound (hereafter referred to as 'CFE/Save the Sound'), please enter these scoping comments on the record of the above captioned Environmental Impact Statement ('EIS') regarding the proposed sale of the federally owned 840 acre Plum Island, off of Orient Point, New York. This scoping letter is intended to augment the oral comments I presented solely on behalf of CFE/Save the Sound at the May 19 scoping meeting hosted by the GSA in Old Saybrook, Connecticut. In the event that there are any discrepancies between my May 19 oral comments and this document, this document shall supersede the oral comments.

CFE/Save the Sound sees merit in the argument presented by community leadership that the region and federal budget would be better served by continuing the USDA research facility at Plum Island with associated continued federal ownership and implicit protection of the undeveloped balance of the island. However, we recognize that such a decision is likely a matter of Congressional policy, and as such, is probably beyond the limits of the GSA's legal authority pursuant to this EIS process.

Before proceeding with the formal comments, CFE/Save the Sound is a not for profit organization dedicated to the restoration and protection of the natural resources of the Long Island Sound watershed. One of the strengths of CFE/Save the Sound is our ability to use legal and scientific expertise together with a combined membership and citizen network of over 10,000 citizens to achieve real environmental protection results.

**Summary of Scoping Request:**

CFE/Save the Sound respectfully requests that the GSA **identify, consider and ultimately select a preferred EIS alternative for an adaptive re-use sale of Plum Island that allows for the re-development and re-use of the developed portion of the island while assuring the permanent conservation protection and appropriate public use for the undeveloped portion of the island.** This alternative would treat two physical portions of the island separately, each being subject to different sale limitations. The already developed portion of the island would be sold to the highest bidder, subject to a complete due diligence review of existing contamination and site conditions in the already developed areas containing the 50,000 square foot research facility and associated infrastructure. In contrast, the vast undeveloped portions of the island would be ideally transferred to the United States Fish and Wildlife Service (USFWS) for conservation and appropriate public use and visitation, also subject to a site contamination evaluation. At a minimum, these undeveloped portions of the island would be sold pursuant to strict permanent conservation restrictions and some rights of public access.



Second, and as importantly, CFE/Save the Sound joins a number of other groups in **requesting that the GSA take at least an entire year and complete a full ecological survey of the large and important habitats on the island.** It is our understanding that biological and ecological surveys have been limited to date to quarterly bird surveys completed over the past three years. Given the fact that there is a strong governmental interest in conserving this island, expressed by the island's selection as a Long Island Sound Stewardship site, it is essential that a full ecological survey be completed and considered prior to the issuance of the DEIS.

Given the strong stated governmental interest in conserving the undeveloped portions of the island as a LIS Stewardship site, **we urge the GSA to invite as cooperating agencies in this EIS process the Environmental Protection Agency (both Region I and II), the USFWS and the New York Department of Environmental Protection and the Connecticut Department of Environmental Protection.** Top leadership of these state and federal environmental regulatory agencies formally endorsed the LIS Stewardship system designation of Plum Island. USFWS scientists played a major role in the stewardship site designation of Plum Island.

Finally, we already know that federally endangered and threatened species utilize the island, and there is a strong probability that more federally listed species will be identified pursuant to a full ecological survey. **Therefore, we also ask the GSA to confer with the Secretary of Interior and select an alternative that meets both the spirit and letter of the federal Endangered Species Act, including your obligation to conserve endangered and threatened species.**

**Plum Island's Designation as a LIS Stewardship Site Demonstrates a Strong Governmental Interest in the Conservation of its Undeveloped Natural Resources**

The highest levels of federal and state governmental leaders established a strong governmental and public interest in the conservation of the undeveloped natural resources of Plum Island by formally adopting Plum Island as a Long Island Sound Stewardship site in 2006.

This designation was undertaken by the governing Policy Committee of the Long Island Sound Study (LISS). Long Island Sound was one of our nation's first listed water bodies within the National Estuary Program established under §320 of the Clean Water Act, 33 U.S.C. §1330. The LISS Management Conference and governing Policy Committee were established to form a cooperating federal-state partnership to establish policies and programs to restore the Sound, pursuant to the National Estuary Program and its designation as an NEP program and pursuant to §119 of the Clean Water Act, 33 U.S.C.A. 1269. The Policy Committee of the LISS is comprised of the Administrators of the two EPA Regions within Long Island Sound waters (Regions I and II) and the Commissioners of the Department of Conservation of New York and the Department of Environmental Protection in Connecticut.

The Policy Committee of the LISS ('Policy Committee') directed the LISS to identify a coordinated strategy for developing a Long Island Sound Stewardship System through its 2003 LIS Agreement. (See electronic copy attached, hard copy submitted as part of May 19 oral presentation.) This was undertaken pursuant to the LISS Comprehensive Conservation and Management Plan for Long Island Sound, adopted by the Policy Committee in 1994 ('CCMP'). Following that directive, representatives of the LIS EPA office, the USFWS, the Connecticut Department of Environmental Protection and five NGOs, including Save the Sound, invested three years in a process of evaluating Stewardship sites along the New York and Connecticut coasts of the Long Island Sound. This process involved reaching out to the general public for suggestions of Stewardship sites, a thorough scientific review of the ecological and recreational resources and a series of public meetings to obtain public feedback on initial recommendations. The final work product recommends 33 Inaugural Stewardship sites. (See Long Island Sound Stewardship Initiative, 2006 Stewardship Atlas, electronic copy attached, hard copy submitted as part of May 10 oral presentation.) These Stewardship sites were officially adopted by the LISS through a Resolution of the Long Island Sound Study Policy Committee Concerning Long Island Sound Stewardship dated September 28, 2006. (See electronic copy attached, hard copy submitted as part of May 19 oral presentation.) The Stewardship Initiative Atlas identifies Plum and Gull Islands complex as collectively being:

- Exemplary colonial water bird habitat, including sites that are of national – if not international significance;
- Small rocky islets dominated by grassy and herbaceous vegetation;
- Colonized by over 6,000 pairs of common tern and approximately 1,200 pairs of roseate tern, making this the second largest breeding population of this endangered species in North America; and
- Identified by the USFWS as a Significant Coastal Habitat.

Note that the Stewardship site map identifies the entire Plum Island as containing these important ecological components. (See attached Stewardship Initiative 2006 Atlas at p. 38.)

**Limited Bird Surveys Document Federally Endangered and Listed Species on Plum:  
Need for Comprehensive Biological and Ecological Survey over at least One Year**

Ornithologists from Audubon New York document that Plum Island contains important and rare bird life, further supporting this Stewardship designation. The island is designated by Audubon New York as critical bird habitat through its Important Bird Area designation. Bird surveys conducted over the past three years during the breeding, winter, and migration seasons document over 100 bird species on Plum Island and adjacent coastal waters. Piping Plovers, a federally threatened species, utilize the shoreline habitat for breeding and foraging. Several dozen Roseate Terns, a federally endangered species, and several hundred Common Terns, a NYS threatened species, also use the island. Much more detail on known and potential bird life and the importance of Plum Island's ecological values are being submitted by Audubon and perhaps the Nature Conservancy.

The recent bird surveys provide a brief glimpse at the ecological value of Plum Island to bird species, and it is likely that far more species depend on it than we are aware. Moreover, CFE/Save the Sound is not aware of any comprehensive ecological survey completed for the various shrub, grassland, wetlands and forest habitats on the island. A thorough and comprehensive biological and ecological inventory of the many island habitats during at least one full year is needed to adequately document significant species and natural biological communities and resources to guide the sale and future uses.

**Highlights of the GSA's Statutory Obligations pursuant to the Facts and Circumstances of this EIS**

The following are intended to highlight GSA's statutory obligations under the facts and circumstances of the proposed Plum Island sale, and are not intended to be exhaustive or complete. CFE/Save the Sound reserves the right to raise other legal issues as this EIS process unfolds.

*Section 540*

Section 540 of the Consolidated Security, Disaster Assistance, and Continuing Appropriations Act of 2009, apparently mandates the public sale of Plum Island. This sale, however, shall be "...***subject to such terms and conditions as necessary to protect government interest and meet program requirements...***" (Emphasis added.) As already documented, the designation of Plum Island as a Long Island Sound Stewardship Site by the Policy Committee of the LISS establishes a strong governmental interest in the conservation and protection of this site. This process and selection was established pursuant to the Long Island Sound Study program, under the authority of the federal Clean Water Act. Given this governmental interest in conserving the undeveloped portions of the island, it is imperative that the GSA consider an adaptive re-use alternative that results in the permanent conservation and protection of this undeveloped portion of the island.

*NEPA*

As you know, the Plum Island EIS must be prepared pursuant to all National Environmental Policy Act (NEPA) requirements. Your obligations in scoping the impacts of the proposed sale include examining the associated direct, indirect and cumulative impacts. 40 C.F.R. §1508.25 (2010). Indirect effects are those "...caused by the action and are later in time or farther removed in distance, but are still reasonably foreseeable. Indirect effects may include growth inducing effects and other effects related to induced changes in the pattern of land use, population density or growth rate, and related effects on air and water and other

natural systems, including ecosystems.” 40 C.F.R. §1508.8 (2010). As noted in your “May 2010 Sale of Plum Island, New York” document posted to the GSA web site, Plum Island incorporates extensive infrastructure that could support intense land use development, including, but not limited to, four miles of existing paved highway, strength in its utility connections and capacity including undersea cables for power and communications, an on-site power plant and oil storage on site with a 2,500 foot oil pipeline from the island harbor coupled with the 9.5 acre Orient Point harbor facility. Based on this existing strong foundation of infrastructure, the GSA must identify the reasonably foreseeable outcome of a high level of development impact on the undeveloped habitat and biological systems of the island associated with a single, unregulated sale of the island. This would include, but not be limited to extensive foreseeable development to the various grass, shrub and forest habitats on the island and the impacts that such intense development and human use would have on the associated dune, beach and coastal environments. The cumulative effects of this induced development on the entire Plum Gull Island Stewardship complex and surrounding ecosystem must also be examined.

Moreover, given Plum Island’s designation as a Long Island Sound Stewardship site by the Region I and II Administrators of the EPA as well as the New York and Connecticut state environmental agencies, these four agencies should be enlisted as cooperating agencies pursuant to the requirements of 40 C.F.R. §1501.6 (2010). The GSA should also enlist the USFWS as a cooperating agency in guiding and assisting with the needed biological survey of the island and the associated ecological role that the island plays in its interaction with the Gull Islands, based on the USFWS’ strong role in developing the LIS Stewardship Atlas. Four USFWS scientists invested hundreds of hours in the development of the LIS Stewardship Initiative 2006 Atlas. (See attached Stewardship Atlas at p. 2.)

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Given that federally endangered and threatened species have been observed on the island, the Endangered Species Act (“ESA”) places additional responsibilities on the GSA as it prepares its EIS. This letter identifies a few of these obligations. First, the GSA, as a federal department, “shall seek to conserve endangered species and threatened species and shall utilize their authorities in furtherance of the purposes [of the GSA].” ESA §2 (c)(1), 16 U.S.C.A. §(1531)(c)(1) (2010). This conservation obligation extends to habitat maintenance. ESA §3(3), 16 U.S.C.A. §1532(3) (2010). Once a complete ecological survey is completed of the island and all federally and threatened species are identified, the GSA must determine whether Plum Island constitutes



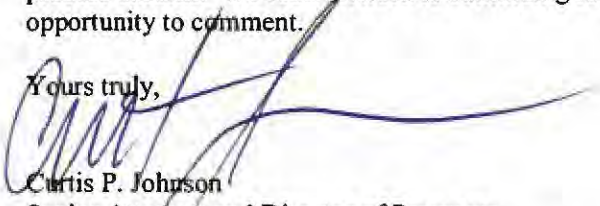
critical habitat for any of these species, in accordance with the provisions of ESA §4(b), 16 U.S.C.A. §1533(b) (2010), or whether any proposed open public sale and indirect foreseeable development impacts are likely to constitute a prohibited "taking" or negatively impact a recovery plan for any of the identified endangered or threatened species pursuant to the ESA. It is important to note that "harm" and "takings" of species is prohibited under the ESA without an incidental takings permit, and these terms include not only impairing breeding behaviors but feeding or sheltering behaviors as well. See ESA §§9 and 10, 16 U.S.C.A. §§ 1538 and 1539 (2010), and ESA Regulations at 50 C.F.R. §17.3 (2010).

Beyond the summary of scoping requests and associated recommendations in this letter, we ask that the GSA continue to communicate openly and transparently with CFE/Save the Sound and all stakeholders on its timeline, decisions and process associated with the development of this EIS. I request that notices of this proceeding be forwarded to both me and Attorney Leah Schmalz at the following address and emails:

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Attorney Leah Schmalz ([lschmalz@savethesound.org](mailto:lschmalz@savethesound.org))  
c/o CFE/Save the Sound  
142 Temple Street, 3<sup>rd</sup> Floor  
New Haven, CT 06510.  
(203) 787-0646

Again, CFE/Save the Sound has not prepared an exhaustive list of issues associated with this EIS, but instead chose to highlight our largest concerns. Therefore, we reserve the right to raise additional legal issues as the process unfolds. We look forward to continuing to work with the GSA, and thank you and your agency for the opportunity to comment.

Yours truly,



Curtis P. Johnson  
Senior Attorney and Director of Programs  
Connecticut Fund for the Environment and its program, Save the Sound

c.c. Mr. Matthew Fritz, office of Governor Jodi Rell  
Mr. Curt Spalding, Region I Administrator, EPA  
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Mr. Mark Tedesco, EPA LISS Office  
Congresswoman Rosa DeLauro  
Congressman Joe Courtney  
Congressman Jim Himes  
Senator Chris Dodd  
Senator Joe Lieberman



June 2, 2010

VIA Electronic Mail Attachment

Mr. Phil Youngberg, Environmental Manager  
C/o Mr. John Dugan  
General Services Administration (GSA)  
10 Causeway Street, Room 925  
Boston, MA 02222  
(email: [john.dugan@gsa.gov](mailto:john.dugan@gsa.gov) // facsimile: 616 565 5720)

Re: Scoping Comments regarding the EIS of a proposed Sale of Plum Island, NY.

Dear Mssrs. Youngberg and Dugan:

On behalf of the Connecticut Fund for the Environment, Inc., and our program Save the Sound (hereafter referred to as 'CFE/Save the Sound'), please enter these scoping comments on the record of the above captioned Environmental Impact Statement ('EIS') regarding the proposed sale of the federally owned 840 acre Plum Island, off of Orient Point, New York. This scoping letter is intended to augment the oral comments I presented solely on behalf of CFE/Save the Sound at the May 19 scoping meeting hosted by the GSA in Old Saybrook, Connecticut. In the event that there are any discrepancies between my May 19 oral comments and this document, this document shall supersede the oral comments.

CFE/Save the Sound sees merit in the argument presented by community leadership that the region and federal budget would be better served by continuing the USDA research facility at Plum Island with associated continued federal ownership and implicit protection of the undeveloped balance of the island. However, we recognize that such a decision is likely a matter of Congressional policy, and as such, is probably beyond the limits of the GSA's legal authority pursuant to this EIS process.

Before proceeding with the formal comments, CFE/Save the Sound is a not for profit organization dedicated to the restoration and protection of the natural resources of the Long Island Sound watershed. One of the strengths of CFE/Save the Sound is our ability to use legal and scientific expertise together with a combined membership and citizen network of over 10,000 citizens to achieve real environmental protection results.

**Summary of Scoping Request:**

CFE/Save the Sound respectfully requests that the GSA **identify, consider and ultimately select a preferred EIS alternative for an adaptive re-use sale of Plum Island that allows for the re-development and re-use of the developed portion of the island while assuring the permanent conservation protection and appropriate public use for the undeveloped portion of the island.** This alternative would treat two physical portions of the island separately, each being subject to different sale limitations. The already developed portion of the island would be sold to the highest bidder, subject to a complete due diligence review of existing contamination and site conditions in the already developed areas containing the 50,000 square foot research facility and associated infrastructure. In contrast, the vast undeveloped portions of the island would be ideally transferred to the United States Fish and Wildlife Service (USFWS) for conservation and appropriate public use and visitation, also subject to a site contamination evaluation. At a minimum, these undeveloped portions of the island would be sold pursuant to strict permanent conservation restrictions and some rights of public access.



Second, and as importantly, CFE/Save the Sound joins a number of other groups in **requesting that the GSA take at least an entire year and complete a full ecological survey of the large and important habitats on the island.** It is our understanding that biological and ecological surveys have been limited to date to quarterly bird surveys completed over the past three years. Given the fact that there is a strong governmental interest in conserving this island, expressed by the island's selection as a Long Island Sound Stewardship site, it is essential that a full ecological survey be completed and considered prior to the issuance of the DEIS.

Given the strong stated governmental interest in conserving the undeveloped portions of the island as a LIS Stewardship site, **we urge the GSA to invite as cooperating agencies in this EIS process the Environmental Protection Agency (both Region I and II), the USFWS and the New York Department of Environmental Protection and the Connecticut Department of Environmental Protection.** Top leadership of these state and federal environmental regulatory agencies formally endorsed the LIS Stewardship system designation of Plum Island. USFWS scientists played a major role in the stewardship site designation of Plum Island.

Finally, we already know that federally endangered and threatened species utilize the island, and there is a strong probability that more federally listed species will be identified pursuant to a full ecological survey. **Therefore, we also ask the GSA to confer with the Secretary of Interior and select an alternative that meets both the spirit and letter of the federal Endangered Species Act, including your obligation to conserve endangered and threatened species.**

**Plum Island's Designation as a LIS Stewardship Site Demonstrates a Strong Governmental Interest in the Conservation of its Undeveloped Natural Resources**

The highest levels of federal and state governmental leaders established a strong governmental and public interest in the conservation of the undeveloped natural resources of Plum Island by formally adopting Plum Island as a Long Island Sound Stewardship site in 2006.

This designation was undertaken by the governing Policy Committee of the Long Island Sound Study (LISS). Long Island Sound was one of our nation's first listed water bodies within the National Estuary Program established under §320 of the Clean Water Act, 33 U.S.C. §1330. The LISS Management Conference and governing Policy Committee were established to form a cooperating federal-state partnership to establish policies and programs to restore the Sound, pursuant to the National Estuary Program and its designation as an NEP program and pursuant to §119 of the Clean Water Act, 33 U.S.C.A. 1269. The Policy Committee of the LISS is comprised of the Administrators of the two EPA Regions within Long Island Sound waters (Regions I and II) and the Commissioners of the Department of Conservation of New York and the Department of Environmental Protection in Connecticut.

The Policy Committee of the LISS ('Policy Committee') directed the LISS to identify a coordinated strategy for developing a Long Island Sound Stewardship System through its 2003 LIS Agreement. (*See* electronic copy attached, hard copy submitted as part of May 19 oral presentation.) This was undertaken pursuant to the LISS Comprehensive Conservation and Management Plan for Long Island Sound, adopted by the Policy Committee in 1994 ('CCMP'). Following that directive, representatives of the LIS EPA office, the USFWS, the Connecticut Department of Environmental Protection and five NGOs, including Save the Sound, invested three years in a process of evaluating Stewardship sites along the New York and Connecticut coasts of the Long Island Sound. This process involved reaching out to the general public for suggestions of Stewardship sites, a thorough scientific review of the ecological and recreational resources and a series of public meetings to obtain public feedback on initial recommendations. The final work product recommends 33 Inaugural Stewardship sites. (*See* Long Island Sound Stewardship Initiative, 2006 Stewardship Atlas, electronic copy attached, hard copy submitted as part of May 10 oral presentation.) These Stewardship sites were officially adopted by the LISS through a Resolution of the Long Island Sound Study Policy Committee Concerning Long Island Sound Stewardship dated September 28, 2006. (*See* electronic copy attached, hard copy submitted as part of May 19 oral presentation.) The Stewardship Initiative Atlas identifies Plum and Gull Islands complex as collectively being:

- Exemplary colonial water bird habitat, including sites that are of national – if not international significance;
- Small rocky islets dominated by grassy and herbaceous vegetation;
- Colonized by over 6,000 pairs of common tern and approximately 1,200 pairs of roseate tern, making this the second largest breeding population of this endangered species in North America; and
- Identified by the USFWS as a Significant Coastal Habitat.

Note that the Stewardship site map identifies the entire Plum Island as containing these important ecological components. (See attached Stewardship Initiative 2006 Atlas at p. 38.)

**Limited Bird Surveys Document Federally Endangered and Listed Species on Plum;  
Need for Comprehensive Biological and Ecological Survey over at least One Year**

Ornithologists from Audubon New York document that Plum Island contains important and rare bird life, further supporting this Stewardship designation. The island is designated by Audubon New York as critical bird habitat through its Important Bird Area designation. Bird surveys conducted over the past three years during the breeding, winter, and migration seasons document over 100 bird species on Plum Island and adjacent coastal waters. Piping Plovers, a federally threatened species, utilize the shoreline habitat for breeding and foraging. Several dozen Roseate Terns, a federally endangered species, and several hundred Common Terns, a NYS threatened species, also use the island. Much more detail on known and potential bird life and the importance of Plum Island's ecological values are being submitted by Audubon and perhaps the Nature Conservancy.

The recent bird surveys provide a brief glimpse at the ecological value of Plum Island to bird species, and it is likely that far more species depend on it than we are aware. Moreover, CFE/Save the Sound is not aware of any comprehensive ecological survey completed for the various shrub, grassland, wetlands and forest habitats on the island. A thorough and comprehensive biological and ecological inventory of the many island habitats during at least one full year is needed to adequately document significant species and natural biological communities and resources to guide the sale and future uses.

**Highlights of the GSA's Statutory Obligations pursuant to the Facts and Circumstances of this EIS**

The following are intended to highlight GSA's statutory obligations under the facts and circumstances of the proposed Plum Island sale, and are not intended to be exhaustive or complete. CFE/Save the Sound reserves the right to raise other legal issues as this EIS process unfolds.

*Section 540*

Section 540 of the Consolidated Security, Disaster Assistance, and Continuing Appropriations Act of 2009, apparently mandates the public sale of Plum Island. This sale, however, shall be "...**subject to such terms and conditions as necessary to protect government interest and meet program requirements...**" (Emphasis added.) As already documented, the designation of Plum Island as a Long Island Sound Stewardship Site by the Policy Committee of the LISS establishes a strong governmental interest in the conservation and protection of this site. This process and selection was established pursuant to the Long Island Sound Study program, under the authority of the federal Clean Water Act. Given this governmental interest in conserving the undeveloped portions of the island, it is imperative that the GSA consider an adaptive re-use alternative that results in the permanent conservation and protection of this undeveloped portion of the island.

*NEPA*

As you know, the Plum Island EIS must be prepared pursuant to all National Environmental Policy Act (NEPA) requirements. Your obligations in scoping the impacts of the proposed sale include examining the associated direct, indirect and cumulative impacts. 40 C.F.R. §1508.25 (2010). Indirect effects are those "...caused by the action and are later in time or farther removed in distance, but are still reasonably foreseeable. Indirect effects may include growth inducing effects and other effects related to induced changes in the pattern of land use, population density or growth rate, and related effects on air and water and other

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Given that federally endangered and threatened species have been observed on the island, the Endangered Species Act (‘ESA’) places additional responsibilities on the GSA as it prepares its EIS. This letter identifies a few of these obligations. First, the GSA, as a federal department, “shall seek to conserve endangered species and threatened species and shall utilize their authorities in furtherance of the purposes [of the GSA].” ESA §2 (c)(1), 16 U.S.C.A. §1531(c)(1) (2010). This conservation obligation extends to habitat maintenance. ESA §3(3), 16 U.S.C.A. §1532(3) (2010). Once a complete ecological survey is completed of the island and all federally and threatened species are identified, the GSA must determine whether Plum Island constitutes

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Congresswoman Rosa DeLauro  
Congressman Joe Courtney  
Congressman Jim Himes  
Senator Chris Dodd  
Senator Joe Lieberman

**RESOLUTION**  
**OF THE**  
**LONG ISLAND SOUND STUDY**  
**POLICY COMMITTEE**  
**CONCERNING**  
**LONG ISLAND SOUND STEWARDSHIP**

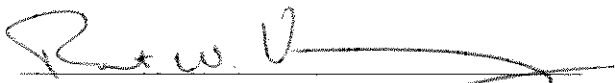
**W**hereas, Long Island Sound is recognized as a National treasure of great cultural, environmental, ecological, and economic importance; and

**W**hereas, as a highly urbanized estuary, the Long Island Sound ecosystem is under stress from both sustained human uses as well as emerging global and regional environmental conditions; and

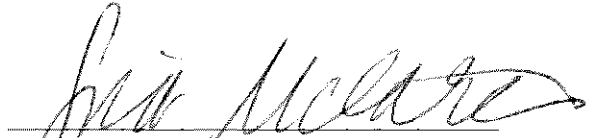
**W**hereas, the *Comprehensive Conservation and Management Plan* for Long Island Sound calls for creation of a system to identify areas of land and water of outstanding or exemplary scientific, educational, or biological value for protection, management or acquisition; and

**W**hereas, at the direction of the Policy Committee under the Long Island Sound 2003 Agreement, the Long Island Sound Study Management Committee has worked to identify key areas in the Long Island Sound watershed that reflect regional differentiation, a variety of ecosystems and significant natural habitats found in the Sound, and public access to this magnificent body of water;

**N**OW THEREFORE BE IT RESOLVED THAT, the Long Island Sound Study Policy Committee, assembled in Rye, New York on September 28, 2006, hereby endorses the work of the Management Committee in recommending thirty-three inaugural Stewardship areas, and hereby adopts them as part of the Long Island Sound Stewardship Initiative.




Robert W. Varney, Regional Administrator  
US Environmental Protection Agency  
New England Region



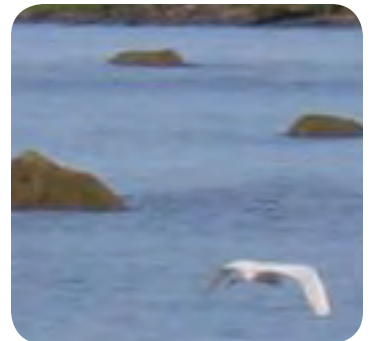
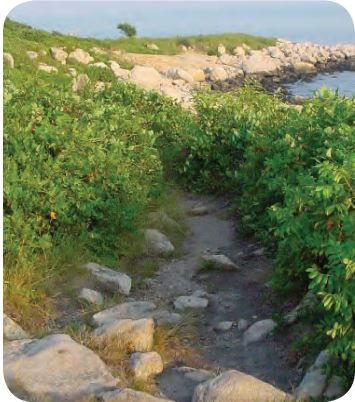
Gina McCarthy, Commissioner  
Connecticut Department of  
Environmental Protection



Alan J. Steinberg, Regional Administrator  
US Environmental Protection Agency  
Region II



Denise M. Sheehan, Commissioner  
New York State Department of  
Environmental Conservation



# Long Island Sound **Stewardship Initiative**

2006 Stewardship Atlas



# Acknowledgements

The Long Island Sound Stewardship Initiative (LISSI) 2006 Stewardship Atlas was prepared by Regional Plan Association and our project partners with generous funding from the U.S. EPA Long Island Sound Office, the New York State DEC and the New York Community Trust. RPA wishes to thank the members of the LISSI workgroup and the public meeting attendees for their time, guidance and participation in drafting the 2006 Stewardship Atlas as presented here.

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This report was designed by Yonah Freemark, Intern, RPA.

Printing for this document is provided by the Long Island Sound Study

A copy of this report can be downloaded at RPA's website [www.rpa.org](http://www.rpa.org)



# Introduction

In 2005, as a culmination of over 3 years of effort, the Long Island Sound Stewardship Initiative work group identified areas around the Sound with significant recreational and ecological values. The 2006 Stewardship Atlas provides maps of these 33 areas, which have been recommended as the inaugural stewardship areas, and describes the major ecological and recreational values of each area.

By identifying these important areas, the Stewardship Initiative aims to highlight the Sound's recreational and ecological resources, to raise awareness of the threats to these resources, and to facilitate on-the-ground stewardship actions. The Initiative promotes coordinated resource planning to develop a network of partners working in concert to address threats and respond to opportunities within each stewardship area.

As illustrated on the following pages, the boundaries of the stewardship areas are not strictly defined. Each area includes one or more "stewardship" sites, which are parcel-specific locations that represent the values or features for which that area is being highlighted. The overall stewardship area includes all sites that are physically or ecologically connected to the stewardship site(s) and where management action would prove beneficial to the stewardship area.

The majority of the recommended areas have stewardship sites that are under public ownership. These places, such as state parks and National Wildlife Refuges, were recognized for the unparalleled levels of public access or significant habitat acreage they provide. Private properties are included only with the permission of their owners, as the Stewardship Initiative is a completely voluntary program. The Stewardship Initiative partners hope that on-the-ground successes with the inaugural stewardship areas will serve as models to encourage participation by more private landowners.

At this time, the Stewardship Initiative focuses on the coastal and near-shore areas of Long Island Sound. However, there is legislation pending in Congress to formally create the Long Island Sound Stewardship Initiative. The current version of the Long Island Sound Stewardship Act, reintroduced in April 2006, limits stewardship activities to upland areas only. With the passage of the Stewardship Act, delineations of stewardship sites below the mean high water line may have to be redrawn.



# Long Island Sound Stewardship Initiative

**The Long Island Sound Study** works to protect and improve Long Island Sound. It is guided by Sound-wide planning efforts: the 1994 Comprehensive Conservation and Management Plan (CCMP) and the 2003 LIS Agreement, which builds upon the goals of the CCMP.

These planning efforts identified a number of high priority problems around the Sound:

1. Low dissolved oxygen (hypoxia)
2. Toxic contamination
3. Pathogen contamination
4. Floatable debris
5. Living resources & habitat management
6. Land use & development

**The Stewardship Initiative** is implementing two of the recommendations related to Living Resources & Habitat Management by identifying places with significant biological, scientific, or recreational value throughout Long Island Sound and developing a strategy to protect and enhance those special places.

The Stewardship Initiative has five specific goals:

- Preserve native plant and animal communities and unique habitat types.
- Improve recreation and public access opportunities.
- Protect threatened and endangered species in their natural habitats.
- Preserve sites that are important for long-term scientific research and education.
- Promote efforts to plan for multiple uses.

For more information on the Stewardship Initiative, go to [www.longislandsoundstudy.net/stewardship](http://www.longislandsoundstudy.net/stewardship)



Jennifer Cox

# Stewardship Initiative Timeline -

**2000** *Listen to the Sound* hearings

**2002** RPA digitizes the sites identified in the *Listen to the Sound* hearings

**2003- Ecological and coastal recreation inventory**

**2004**

RPA and the US Fish & Wildlife Coastal Program worked with resource experts in CT and NY to conduct a comprehensive analysis of the Sound's resources within its immediate coastal areas.

The inventory of important recreation and open space areas throughout Long Island Sound was led by the Regional Plan Association. The process of inventorying these sites involved combining input from resource managers and the public with available information regarding existing recreational facilities and parks.

The first step in the analysis was to meet with public and private natural resource managers and planners to identify criteria and landscape attributes that were important for open space and water-dependent recreation areas. Approximately 30 criteria and attributes were mapped in the following four categories: 1) public access to the water; 2) recreational and conservation need; 3) water resource protection; and 4) open space, cultural and recreational resources.

The inventory of important ecological areas was led by the US Fish & Wildlife Service Coastal Program, in cooperation with NY and CT resource experts. As a basis for the analysis, the following categories were developed to inventory the ecological and scientific resources throughout Long Island Sound:

**Exemplary Sites** – Areas that are representative of natural habitat types or ecosystems that are typical to Long Island Sound. These are areas that are not degraded. Included in this category are sites with high species productivity, concentration, or areas of high biological diversity.

**Outstanding Sites** – Areas that contain examples of unique or rare habitats or ecosystems. Included in this category are unditched tidal marshes or secondary dunes. Sites in this category may either be unique to the Sound or rare in a regional landscape context.

**Rare Species Habitat Sites** – Areas that serve as habitat for an assemblage of Federal or State listed threatened or endangered species or those areas that support an unusually high concentration of a single threatened or endangered species.

**Research/Educational Sites** – Areas that provide opportunities for research on and education about Long Island Sound.

**2005- Ecological and coastal recreation areas proposed for inclusion in the Long Island Sound**  
**2006 Stewardship Initiative**

With the aid of computerized mapping software (GIS), stewardship sites were chosen from the thousands of sites identified through the inventories and were organized into stewardship areas. Sites were selected based on the number of ecological or recreational categories that applied and, for recreation sites, the number of patrons served. Additional criteria used to identify the inaugural areas included representation of the Sound's diverse habitat types and recreational opportunities, the distribution of sites around the Sound, and community support for recognition of the area.









## Long Island Sound Stewardship Initiative Inaugural Stewardship Areas -



## Stewardship Areas in Connecticut - *from east to west*

Barn Island	10
Bluff Point	11
Great Neck - Goshen Point	12
Rocky Neck & Watts Island	13
Lower Connecticut River	14
Duck Island	15
Hammonasset Beach	16
Falkner Island	17
Quinnipiac River	18
West Rock Ridge	19
Sandy Point	20
Charles Island & Milford Point	21
Great Meadows	22
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Norwalk River & Harbor	24





Jennifer Cox

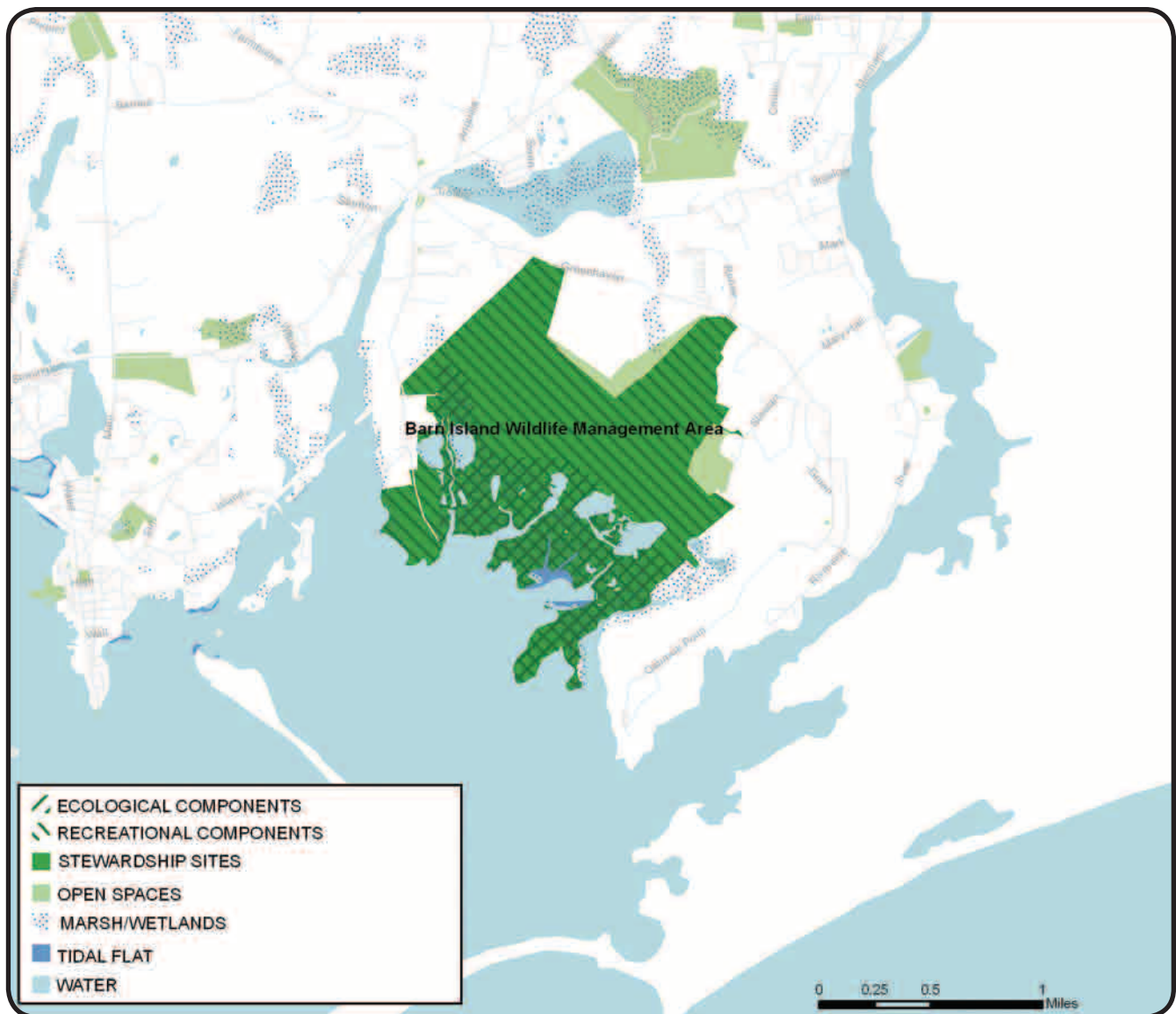
## Stewardship Areas in New York

*Westchester County and from west to east*

- 25 Edith G. Read - Marshlands
- 26 Huckleberry - Davids Islands & Pelham Bay
- 27 Alley Pond
- 28 Manhasset Bay
- 29 Hempstead Harbor
- 30 Oyster Bay
- 31 Lloyd Neck
- 32 Crab Meadow
- 33 Nissequogue River
- 34 Stony Brook Harbor
- 35 Mt Sinai - Port Jefferson Harbor
- 36 Shoreham - Wading River
- 37 Jamesport - Mattituck Creek
- 38 Plum & Gull Islands
- 39 Fishers Island Coastline



## Barn Island Stonington, Connecticut -



### **Stewardship Site:** Barn Island Wildlife Management Area

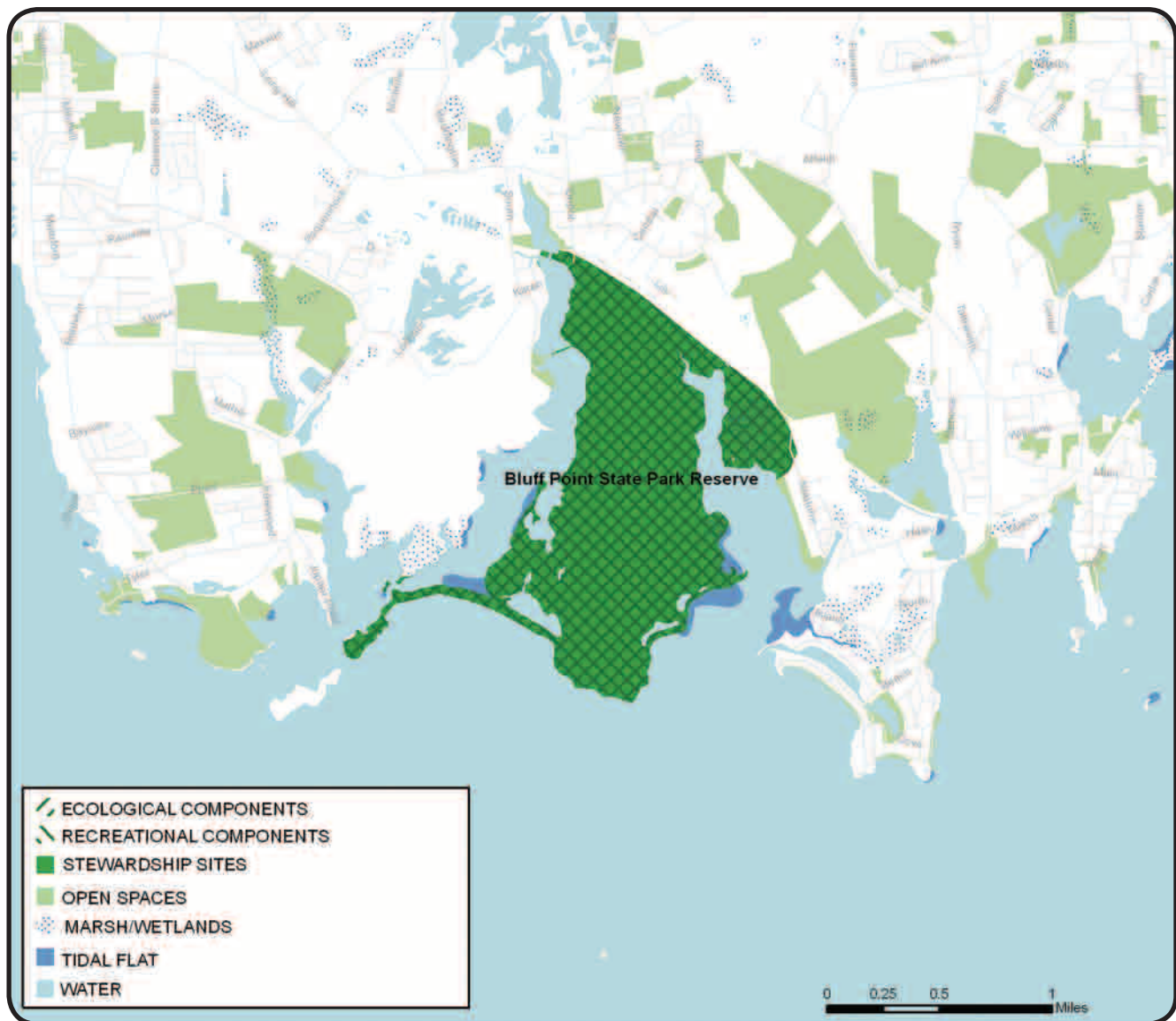
#### **Ecological significance:**

- Focus of over 50 years of continuous wetland research, including investigations into wetland degradation, and one of the few sites on the east coast to have pre-disturbance baseline mapping
- Contains five tidal wetland restoration sites that have been the subject of almost 25 years of pre- and post-restoration research and monitoring
- Exemplary salt and brackish marsh
- Includes rare fen habitat

#### **Recreational significance:**

- National Audubon designated “Globally Significant Important Birding Area” site
- New marsh education and viewing area and native plant demonstration area
- One of few extensive coastal trail systems in Connecticut (over 4.5 miles of trails)
- Regionally significant coastal education outdoor classroom
- Regionally significant waterfowl hunting area
- Highly popular state-of-the-art marine boating access facility

## Bluff Point Groton, Connecticut -



### **Stewardship Site:** Bluff Point State Park and Natural Area Preserve

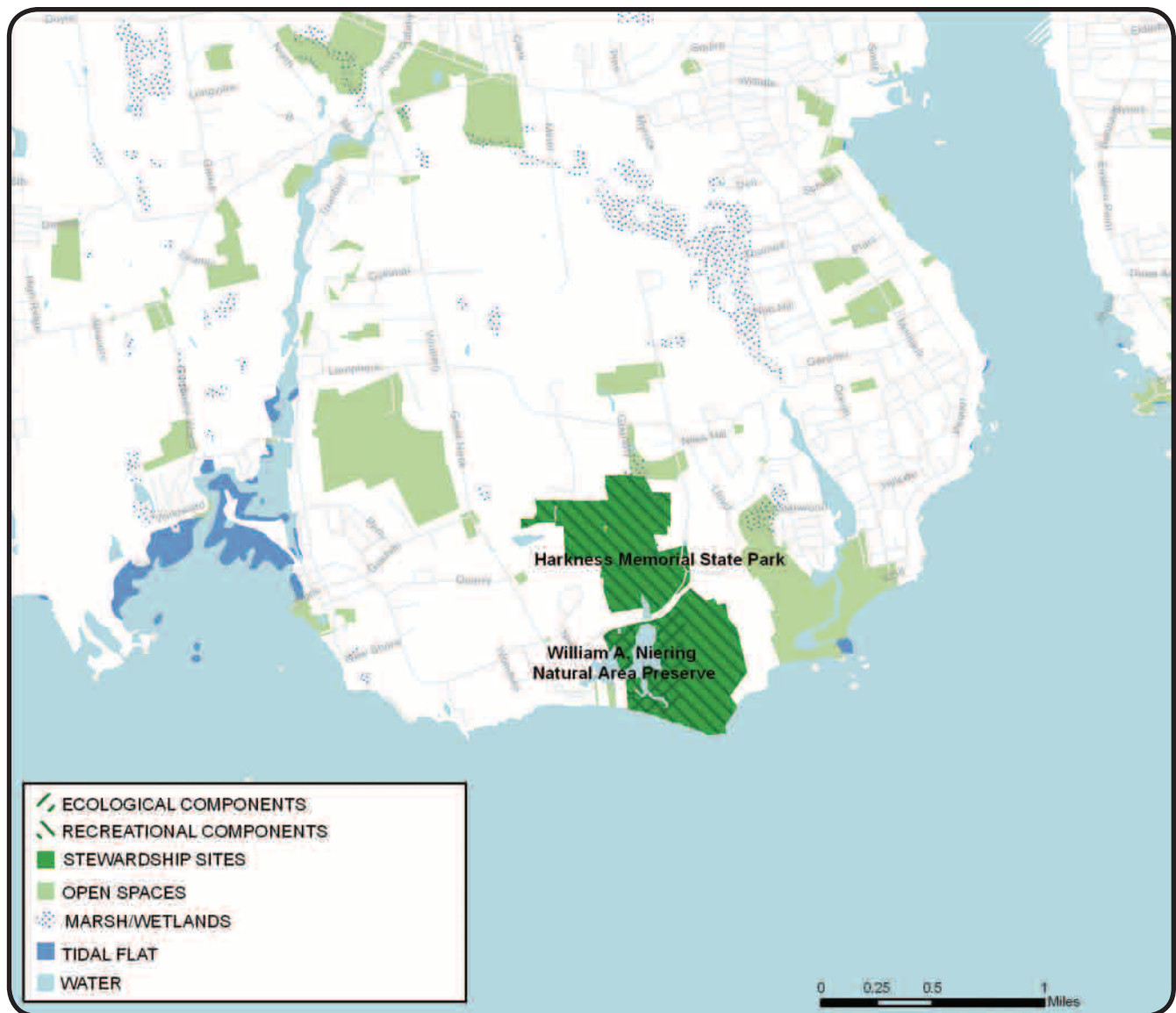
#### **Ecological significance:**

- Exemplary beach and dune habitat
- Rare back barrier sand flat habitat with rare plant communities and species
- Rare oligohaline wetland system
- Includes 'coastal old growth forest' and rare fen habitat

#### **Recreational significance:**

- Undeveloped barrier beach provides a unique "natural sandy beach experience"
- Car-top boat launch facility allows visitors to explore Poquonuck River salt marsh and popular coves along Fishers Island Sound
- Coastal bluff provides extraordinary views of southeastern Connecticut coastal landmarks (e.g. Ledge Light, Bushy Point barrier beach, and Pine Island)
- Recreational shellfish area
- Regionally significant coastal education outdoor classroom
- Nominated as a Connecticut Coastal Birding Trail Site

## Great Neck - Goshen Point Waterford, Connecticut -



**Stewardship Sites:** Harkness Memorial State Park and William A. Niering Natural Area Preserve

**Ecological significance:**

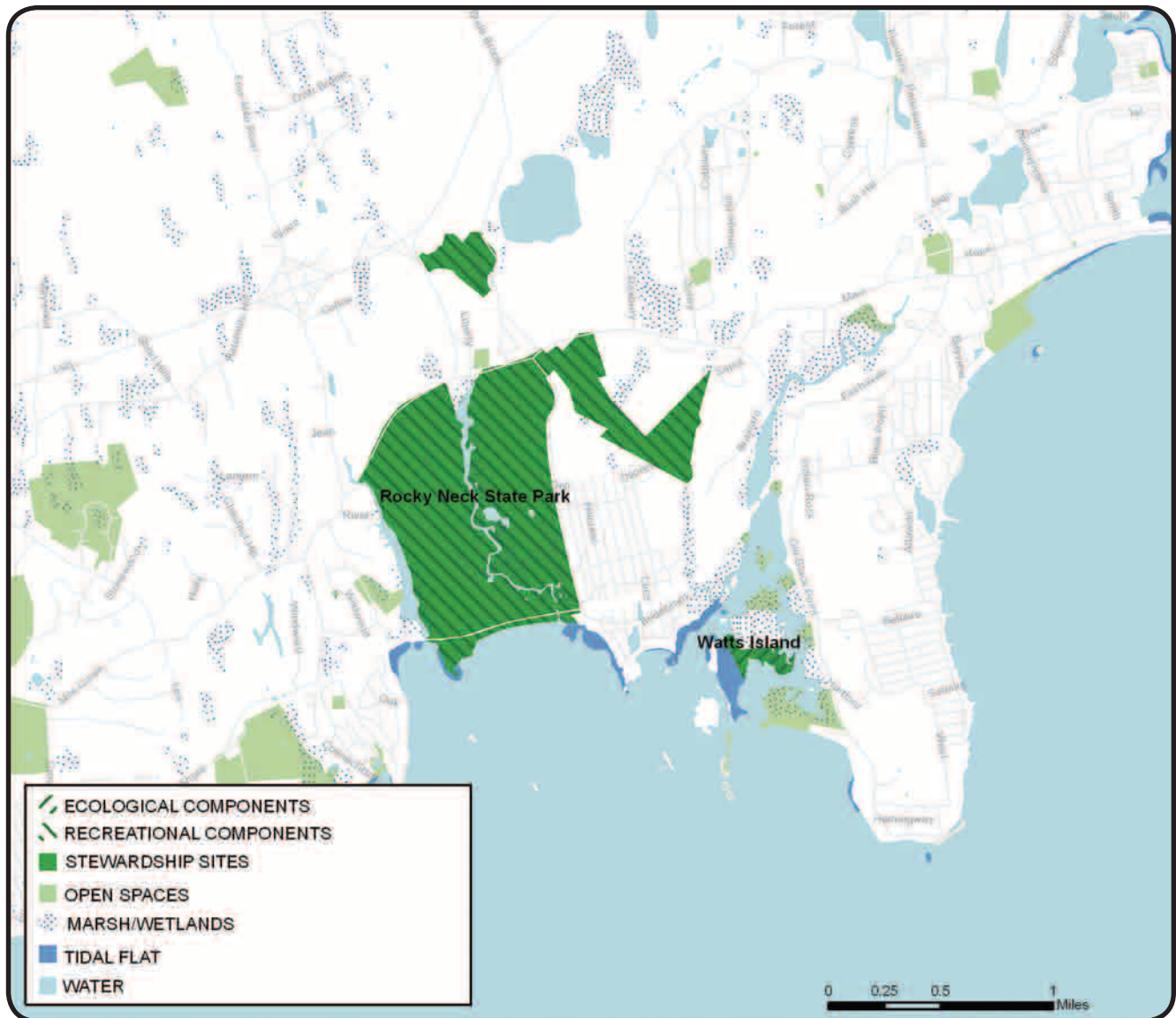
- Exemplary coastal barrier beach and primary dune communities
- Includes coastal grassland habitat

**Recreational significance:**

- Unusual and outstanding historical/cultural tourism attraction
- Provides a unique combination of coastal resource-based recreation and cultural tourism opportunities
- Fourth most visited park in state park system



# Rocky Neck & Watts Island East Lyme, Connecticut -



## **Stewardship Site:** Rocky Neck State Park

### **Recreational significance:**

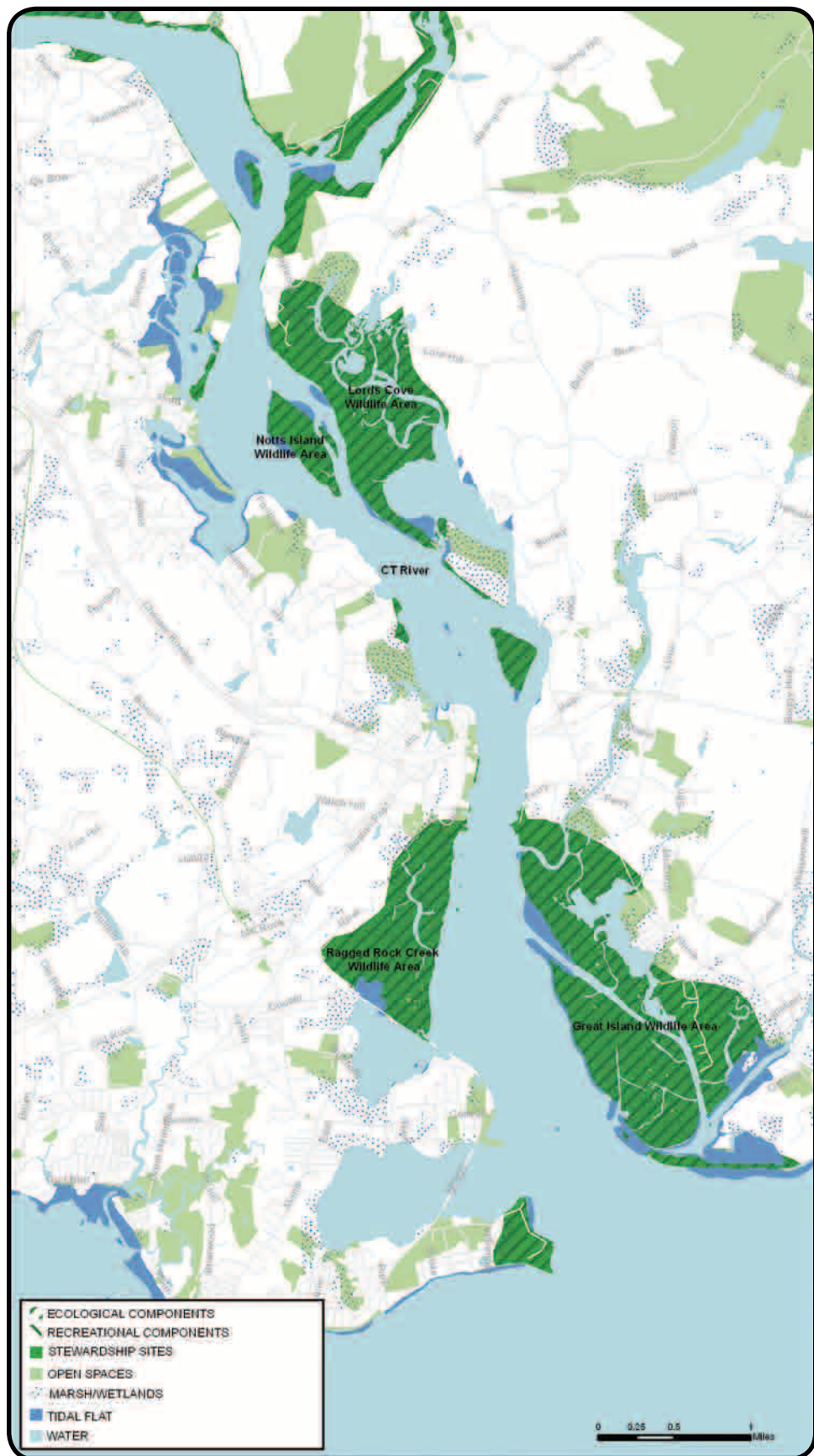
- Woodland-marsh trail system and coastal camping
- Coastal education nature center
- Highly popular swimming beach
- Historic and architecturally significant pavilion
- Rocky-shorefront popular with salt water anglers
- Diversity of recreation opportunities – unique on Long Island Sound
- Third most visited park in state park system

## **Stewardship Site:** Watts Island (owned by The Nature Conservancy)

### **Ecological significance:**

- Outstanding coastal barrier with the highest primary dune system in Connecticut
- Supports the best developed coastal maritime shrub thicket
- Site of tidal wetland research and sedimentation studies

# Lower Connecticut River Old Saybrook, Essex, Deep River, Lyme and Old Lyme, Connecticut



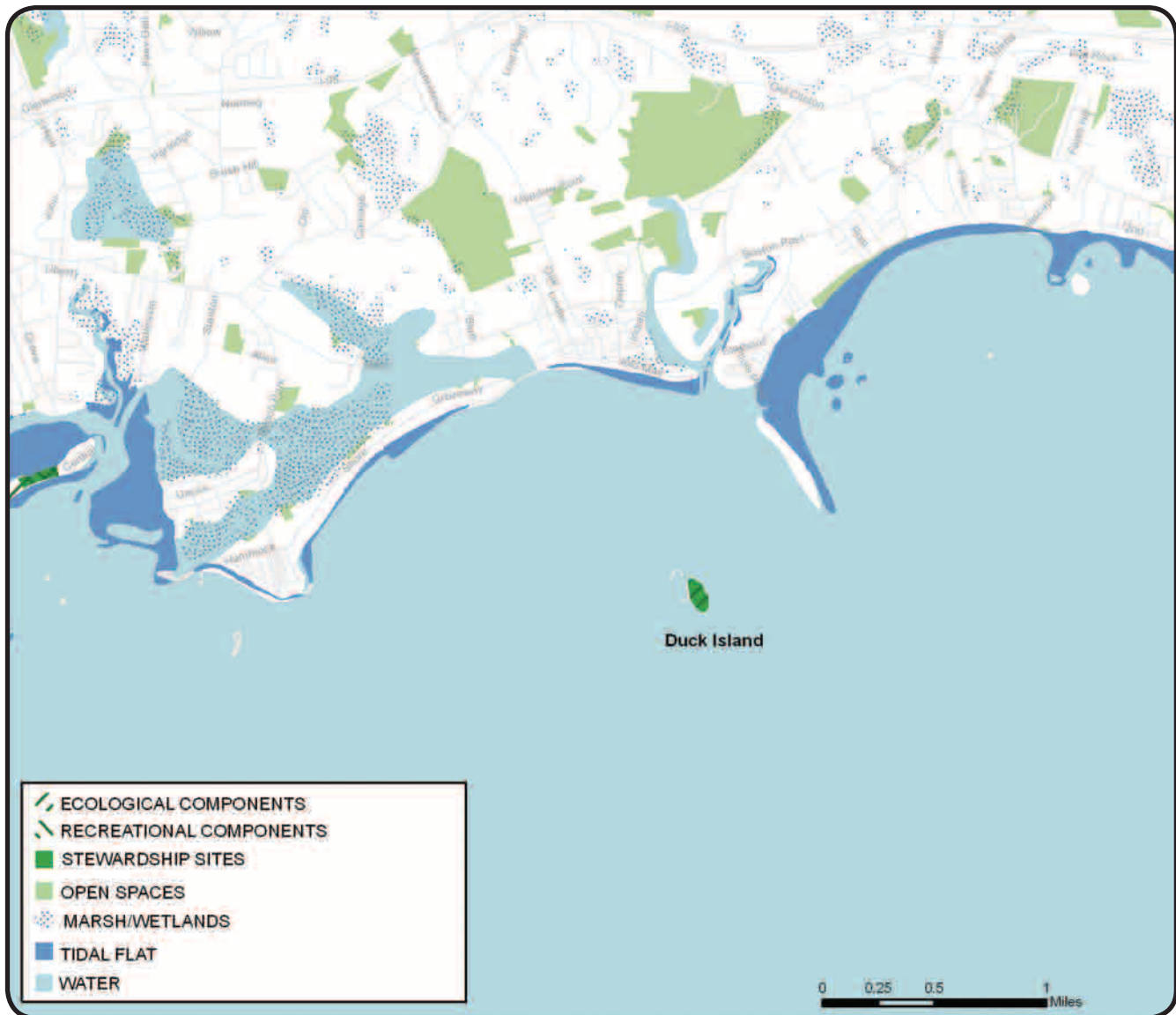
## Stewardship Site:

Connecticut River Ramsar Complex

## Ecological significance:

- Recognized as containing “Wetlands of International Importance” under the Ramsar convention
- Outstanding brackish – tidal fresh marsh complex

## Duck Island Westbrook, Connecticut -



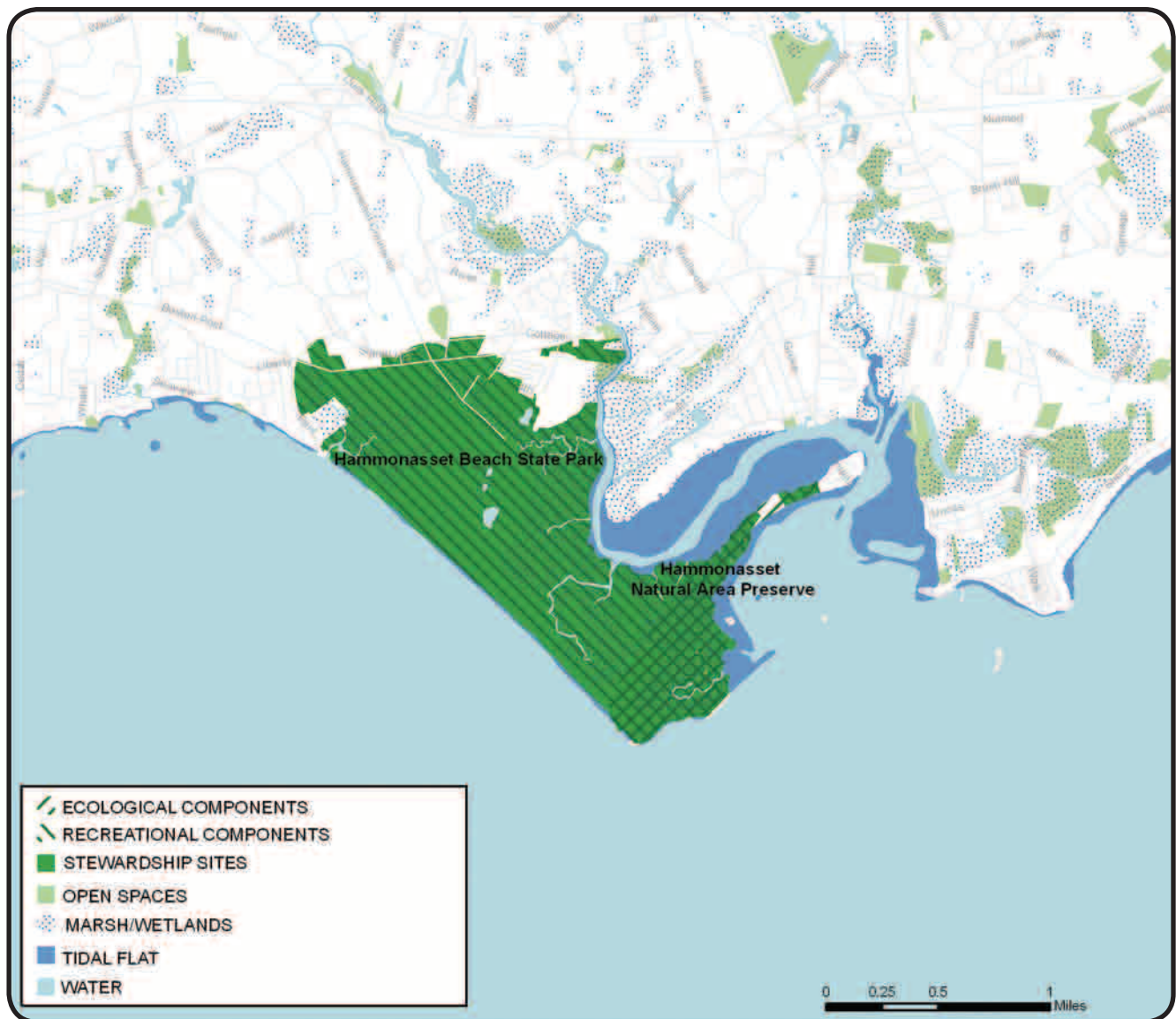
**Stewardship Site:** Duck Island Natural Area Preserve

**Ecological significance:**

- Provides nesting grounds for endangered roseate terns and other colonial water birds
- Exemplary island habitat



# Hammonasset Beach Madison, Connecticut -



## **Stewardship Sites:** Hammonasset Beach State Park and Natural Area Preserve

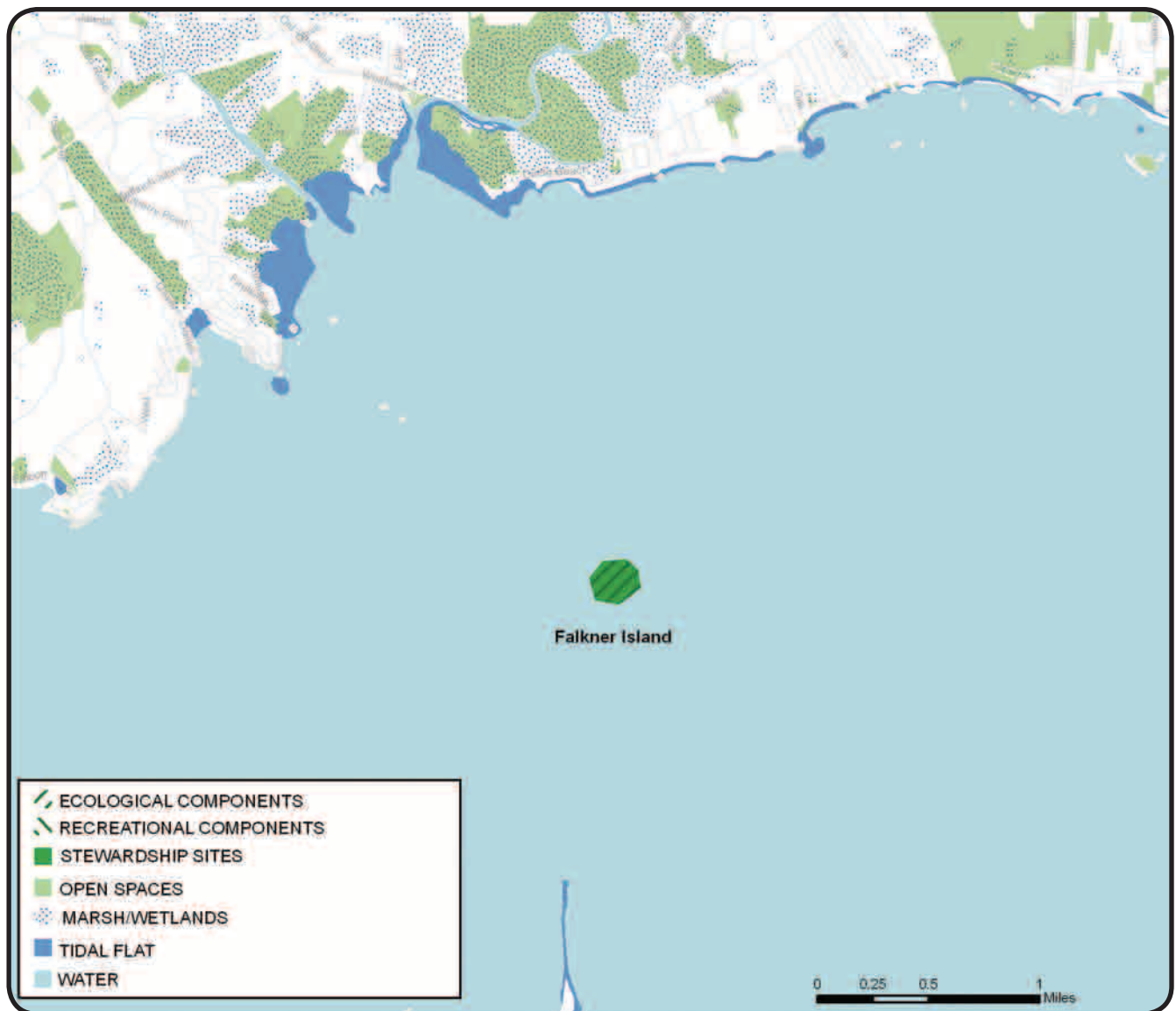
### **Ecological significance:**

- Extensive and exemplary salt marshes
- Exemplary coastal barrier habitat and plant communities
- Significant long-term research site

### **Recreational significance:**

- Provides outstanding coastal education services and interpretive programs
- National Audubon designated “Globally Significant Important Birding Area” site
- Extensive coastal trail system and opportunities for coastal camping
- Most visited park in state park system

## Falkner Island Guilford, Connecticut -

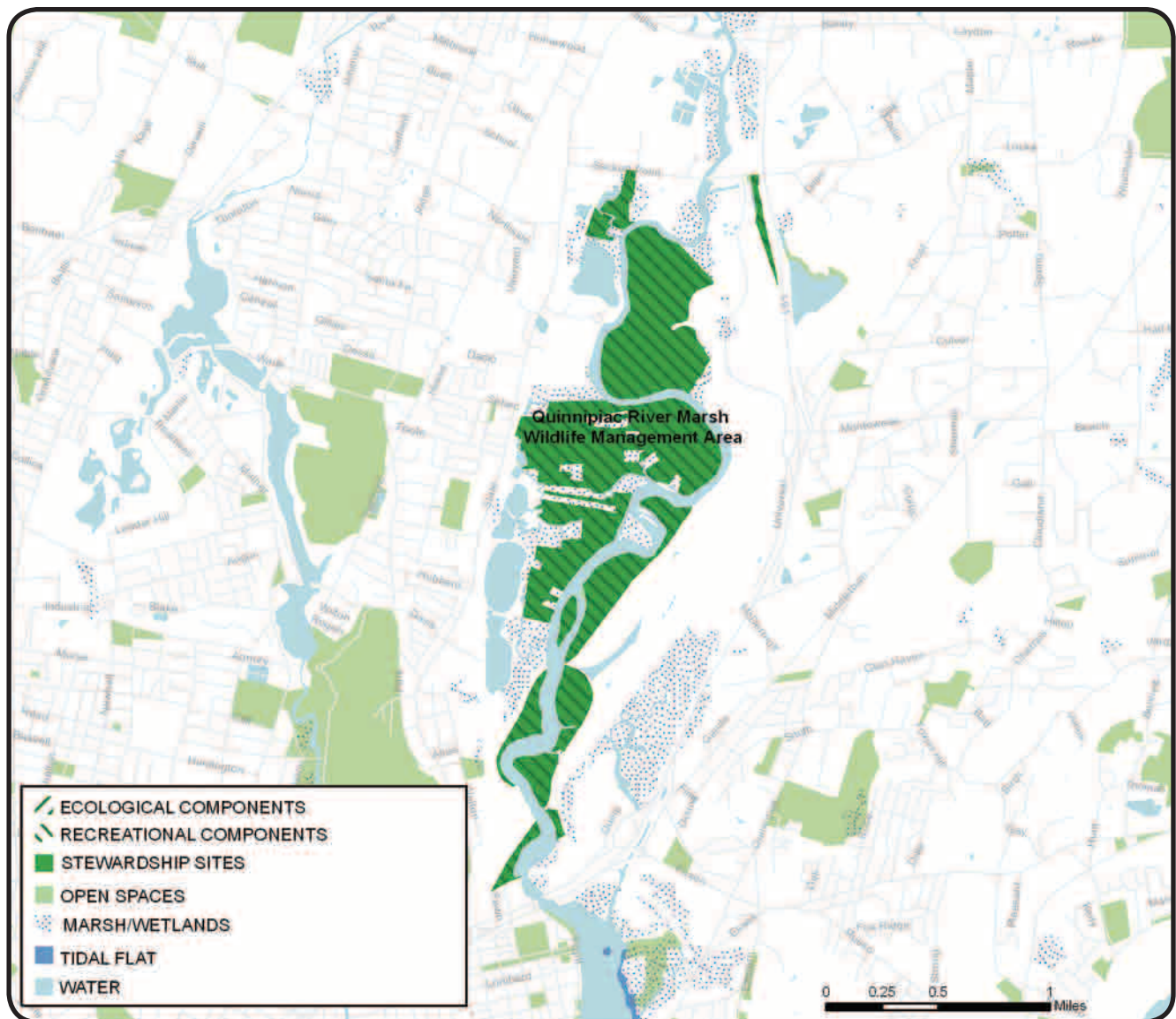


**Stewardship Site:** Falkner Island Unit of the Stewart B. McKinney National Wildlife Refuge

**Ecological significance:**

- Provides nesting grounds for endangered roseate terns and other colonial water birds
- Exemplary island habitat

## Quinnipiac River New Haven, Connecticut -



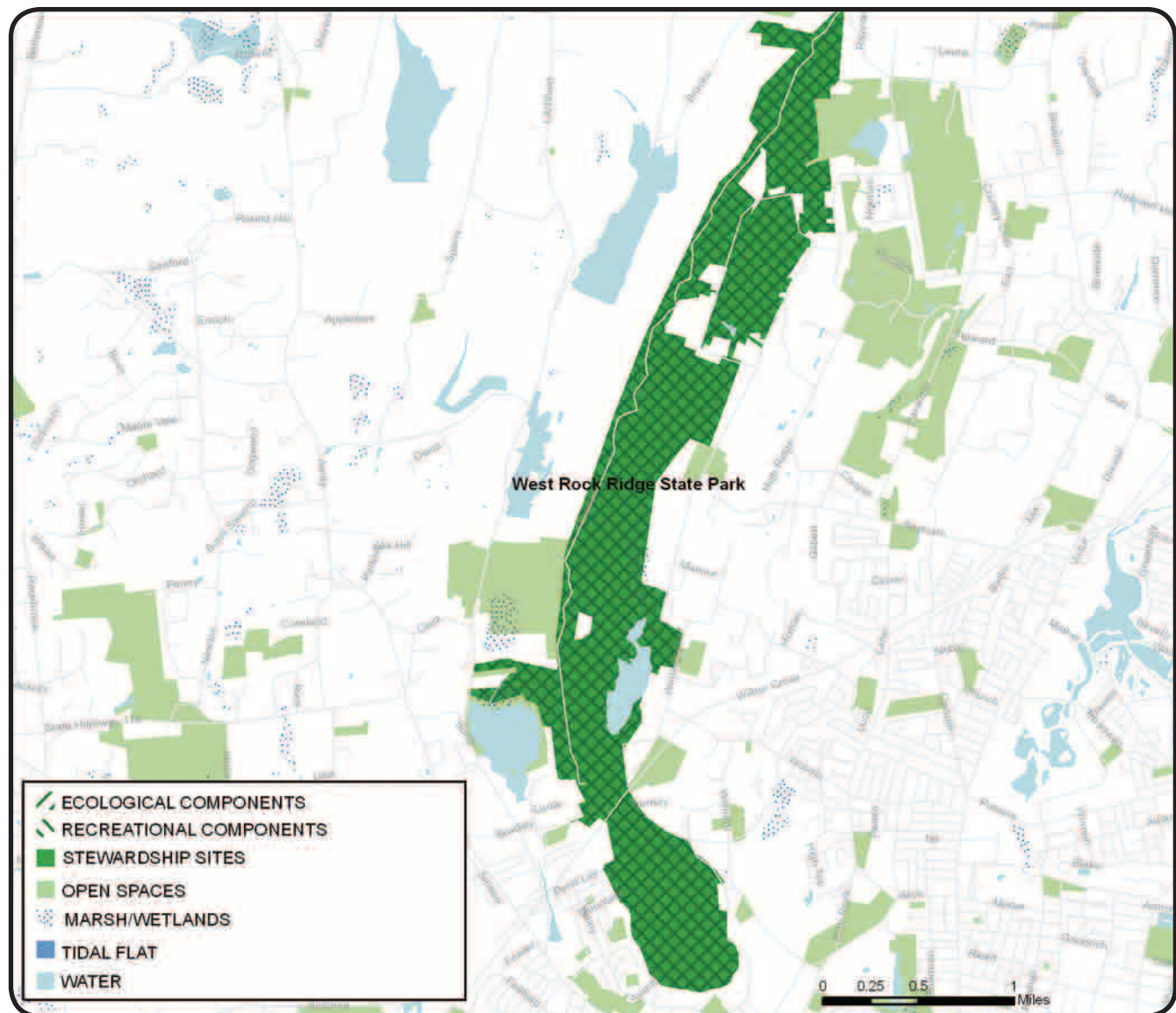
**Stewardship Site:** Quinnipiac River Marsh Wildlife Management Area and State Park

**Recreational significance:**

- National Audubon designated “Important Birding Area” site
- Important waterfowl hunting area



## West Rock Ridge Hamden and New Haven, Connecticut -



### Stewardship Site: West Rock Ridge State Park

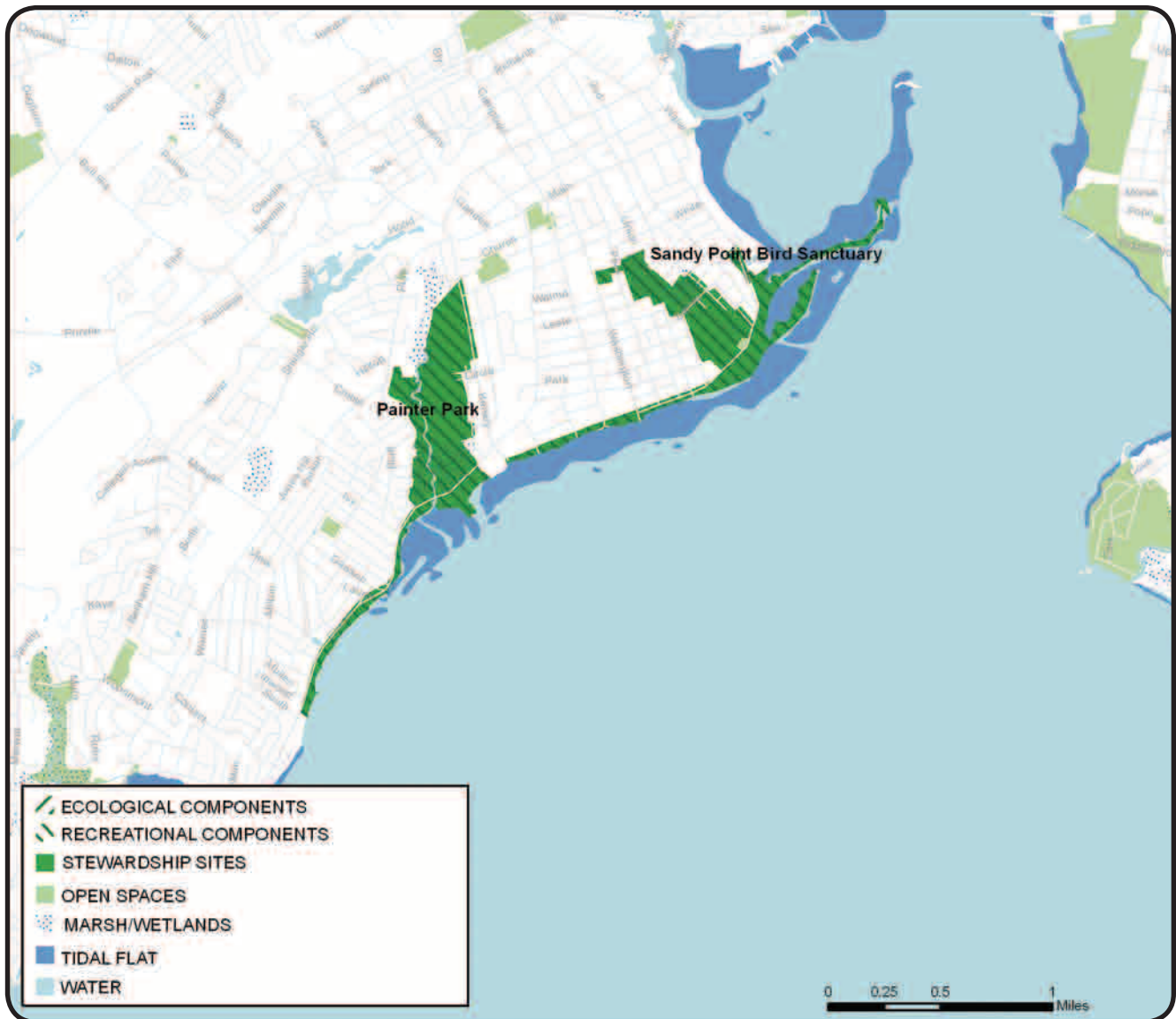
#### Ecological significance:

- Outstanding traprock ridge segment
- Provides habitat for numerous rare plants and insects
- Rare landform type in the Long Island Sound ecosystem

#### Recreational significance:

- Site of extraordinary geological history interest
- Includes a nature center
- Provides boating access to the West River
- Extensive trail system

## Sandy Point West Haven, Connecticut -

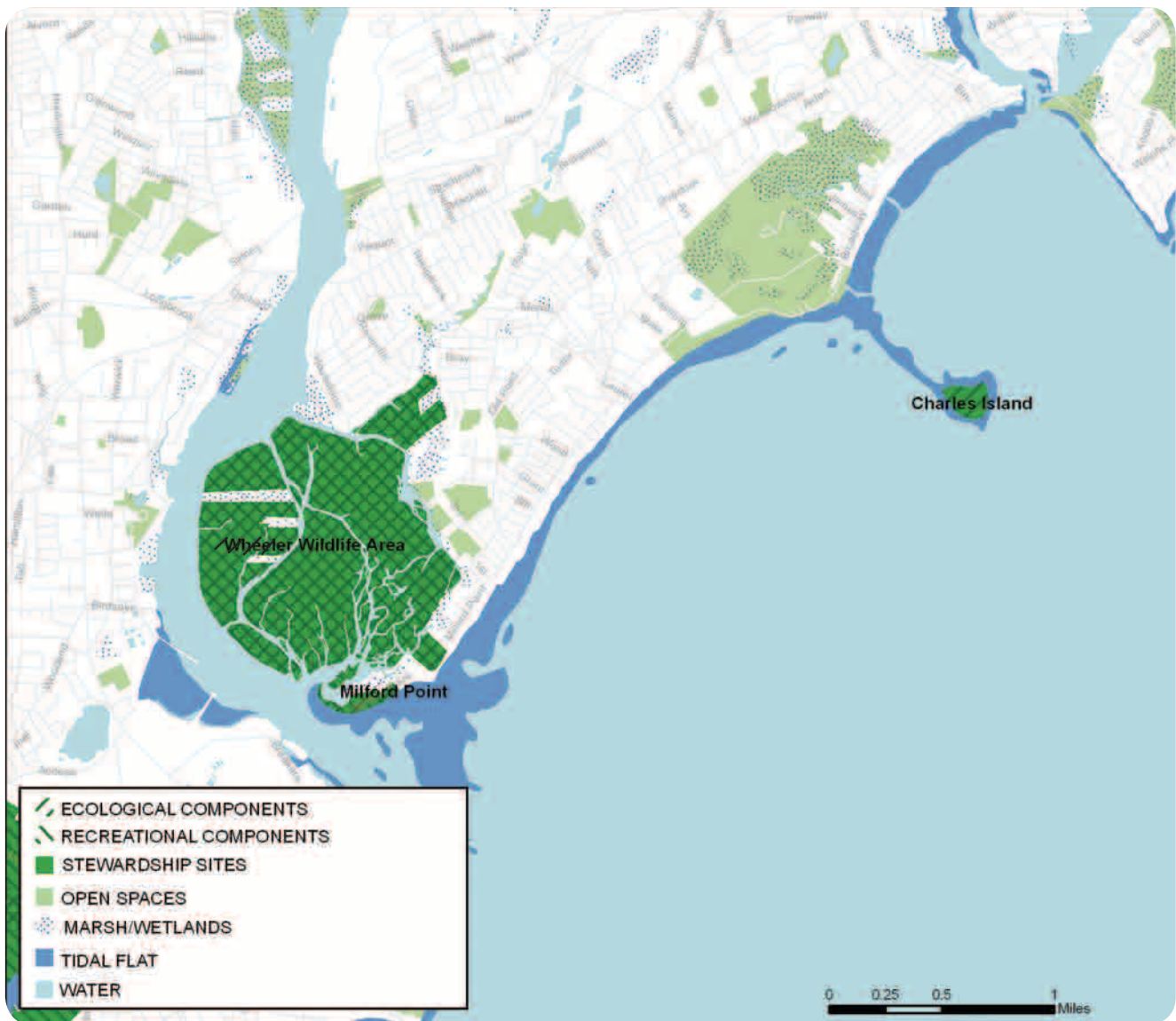


### **Stewardship Sites:** Sandy Point Bird Sanctuary and Painter Park

#### **Recreational significance:**

- 3.5 miles of beach from Bradley Point Park to Sandy Point
- Connected by a 1.7-mile urban waterfront greenway for pedestrians, bikes, and rollerbladers
- Supports a variety of fishing, swimming and boating opportunities in an urban setting
- Provides scenic views of the lighthouse located in New Haven Harbor
- Wildlife viewing from Sandy Point and the Bird Sanctuary

# Charles Island & Milford Point Milford, Connecticut -



**Stewardship Site:** Charles Island Natural Area (part of the Stewart B. McKinney National Wildlife Refuge)

**Ecological significance:**

- Provides nesting grounds for endangered roseate terns and other colonial water birds
- Exemplary island habitat

**Stewardship Sites:** Milford Point (part of the Stewart B. McKinney National Wildlife Refuge) and Wheeler Wildlife Management Area

**Ecological significance:**

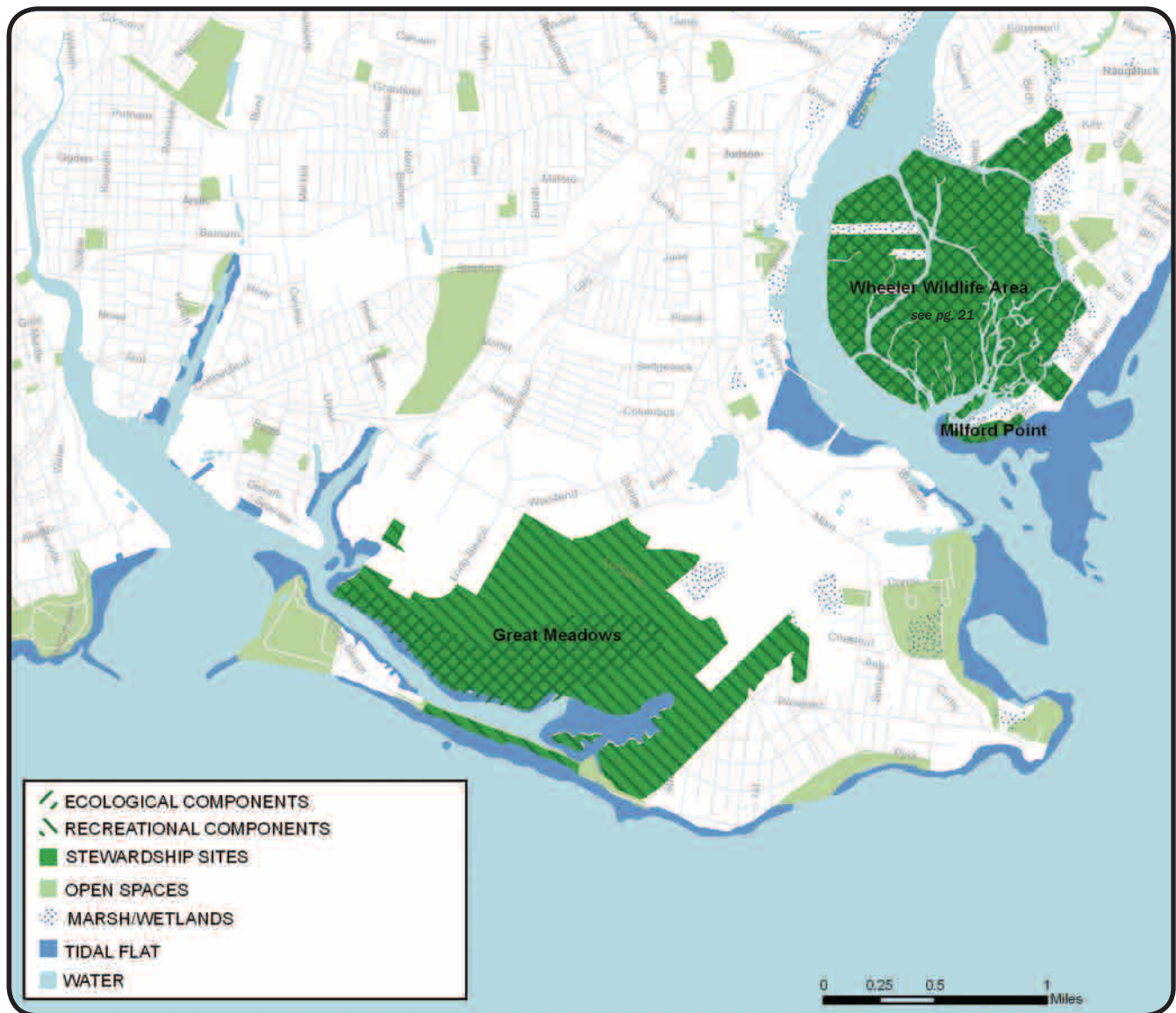
- Outstanding back barrier sand flats with rare plant communities and species
- Exemplary primary dune habitat
- Largest unditched brackish marsh complex dominated by low marsh in Long Island Sound
- Includes intertidal shoals that, in combination with the brackish marshes, are a significant wildlife concentration area and provide habitat and foraging areas for colonial water birds

**Recreational significance:**

- Outstanding coastal outdoor education facility
- Regionally significant waterfowl hunting area



## Great Meadows Stratford, Connecticut -



**Stewardship Site:** Great Meadows Unit of the Stewart B. McKinney National Wildlife Refuge

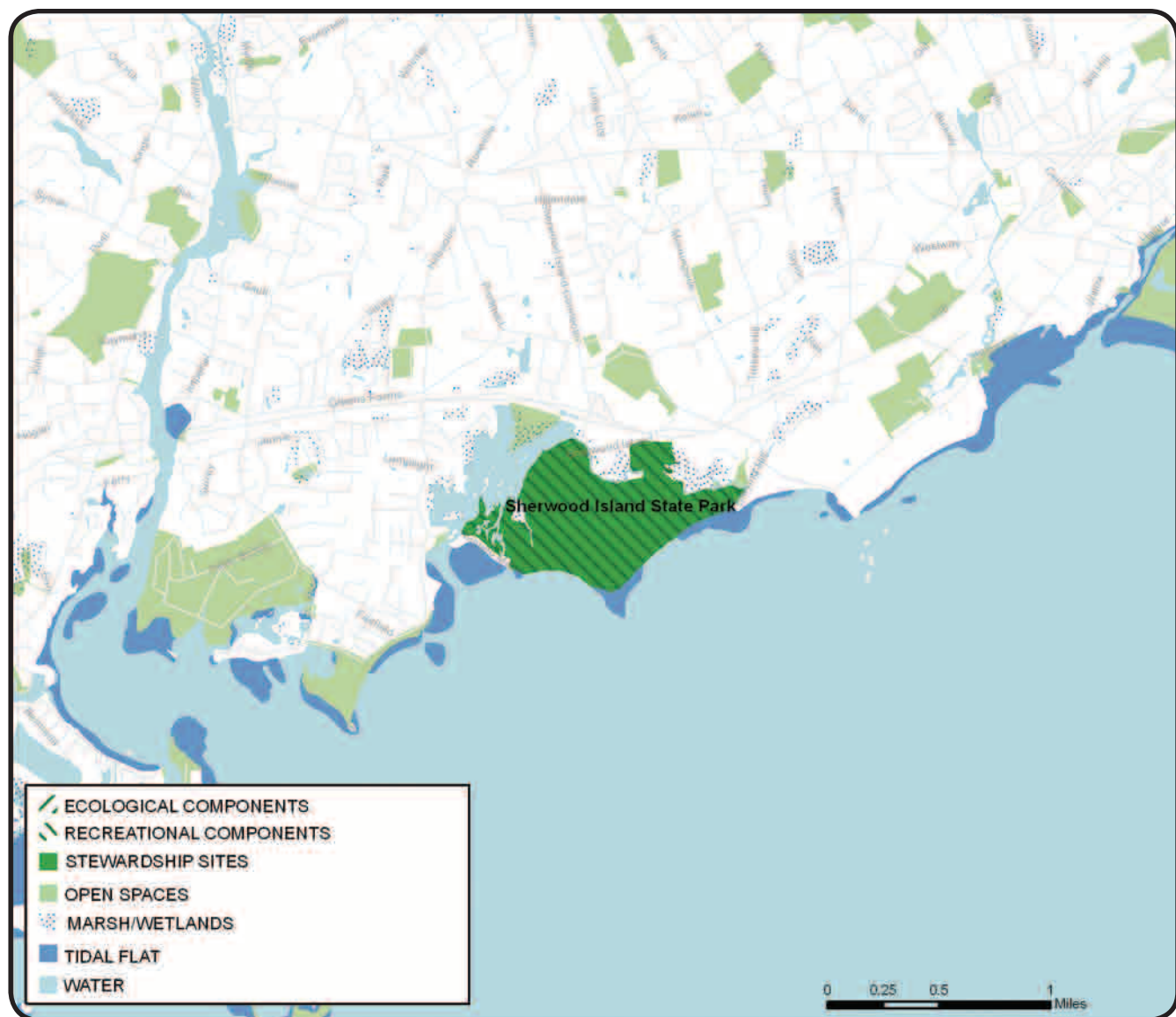
**Ecological significance:**

- Critical colonial water bird habitat
- Largest complex of unditched high marsh in Connecticut
- Provides habitat for rare plant and animal species

**Recreational significance:**

- Provides swimming, fishing and boating opportunities
- Onshore access for wildlife viewing

## Sherwood Island Westport, Connecticut -

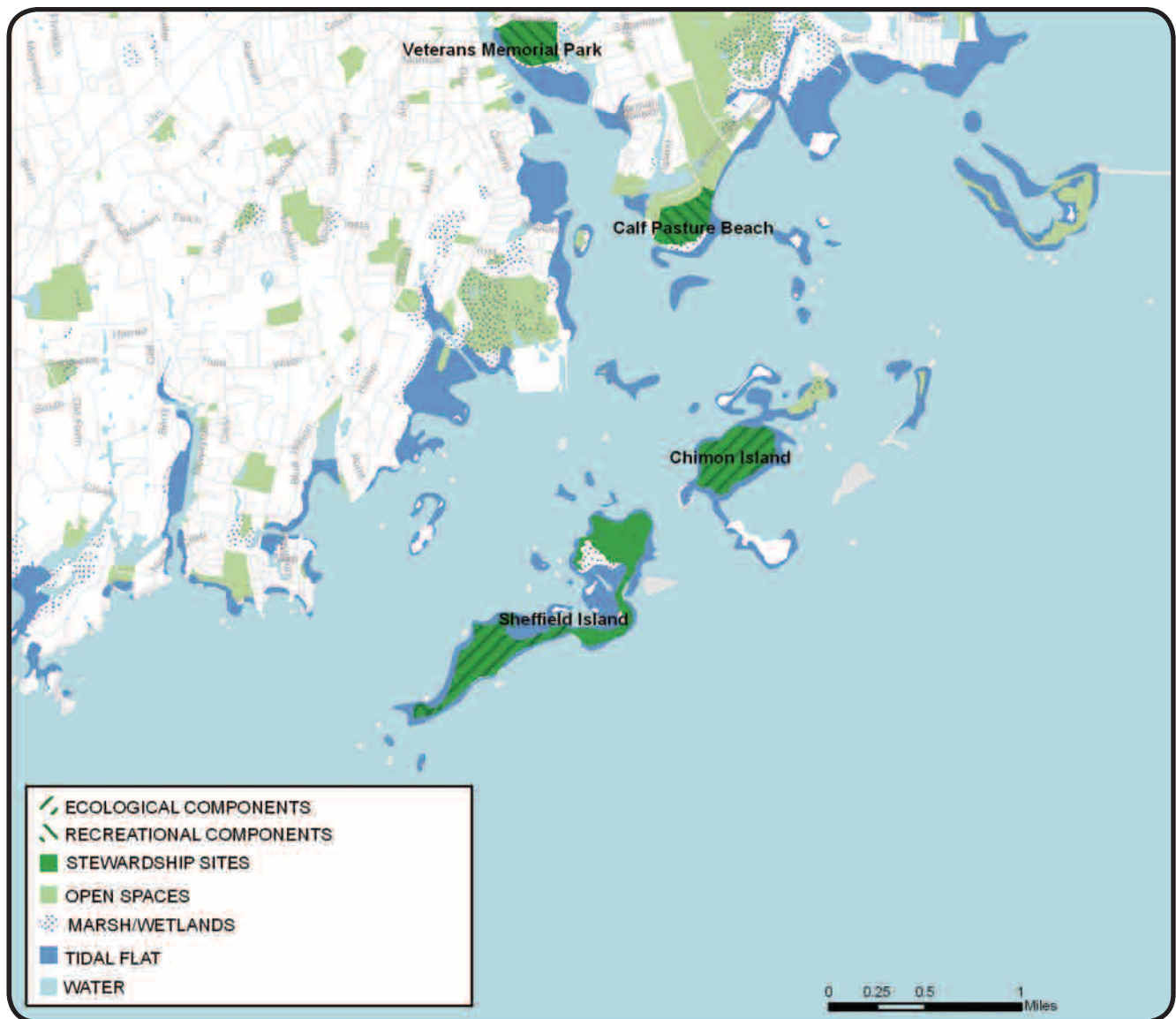


### **Stewardship Site:** Sherwood Island State Park

#### **Recreational significance:**

- Significant saltwater swimming beach serving New York/Bridgeport metropolitan areas
- Nature trails
- September 11th Living Memorial
- State-of-the-art natural resource experiential learning facilities opened in 2005
- Approximately 500,000 visitors each year, making it the second most visited state park

# Norwalk River & Harbor Norwalk, Connecticut -



**Stewardship Sites:** Chimon and Sheffield Islands (part of the Stewart B. McKinney National Wildlife Refuge)

**Ecological significance:**

- Critical colonial water bird habitat
- Exemplary island habitat

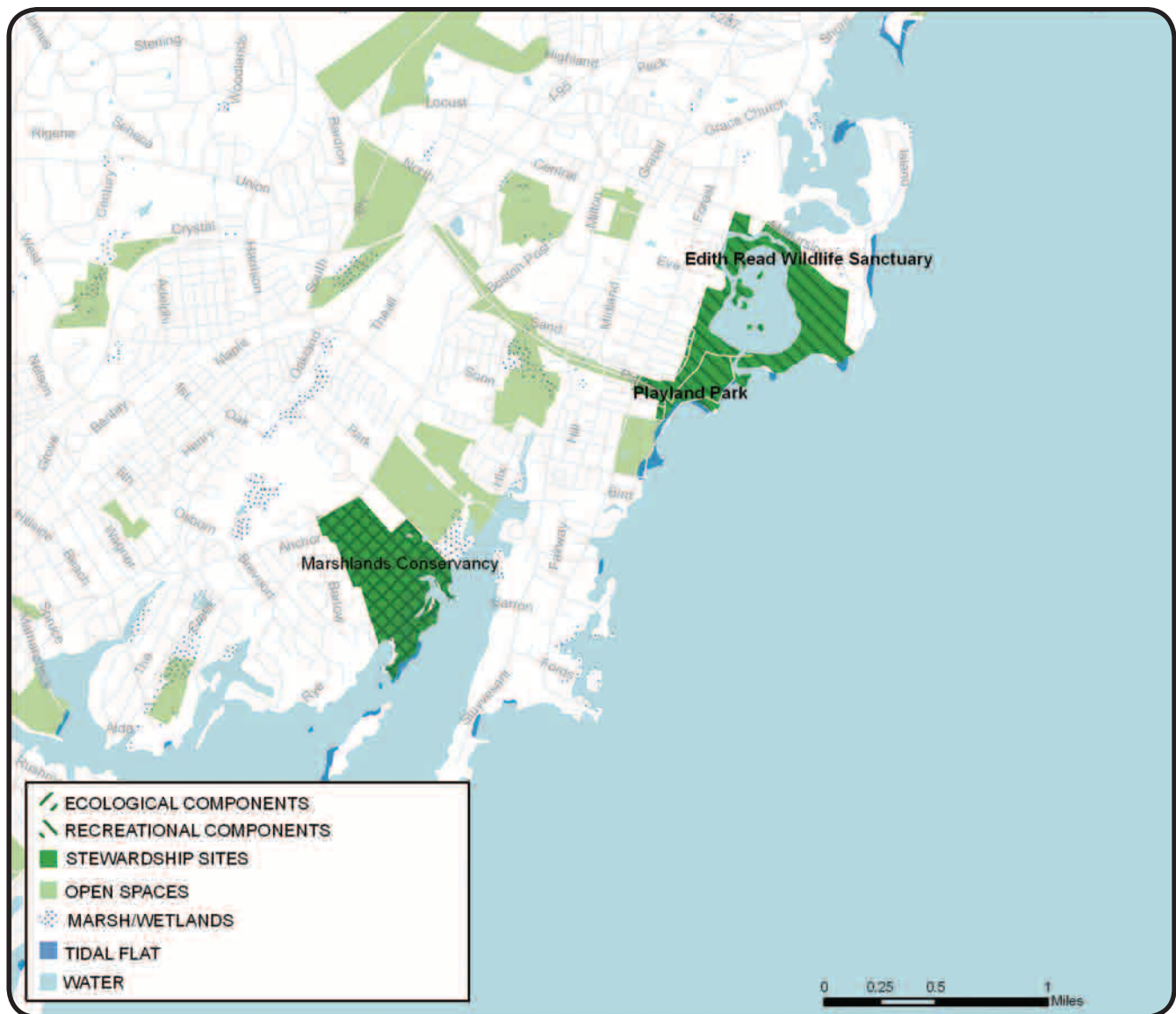
**Stewardship Sites:** Calf Pasture Beach and Veterans Memorial Park

**Recreational Significance:**

- Key urban waterfront access points where recreational need is high for city population
- Access opportunities provided by privately owned waterfront walkways
- Includes public boat slips and moorings, boat launches for both small and trailered boats, and fishing access areas



## Edith G. Read - Marshlands Rye and Harrison, New York -



**Stewardship Sites:** Marshlands Conservancy, Edith G. Read, and Rye Playland Park

### Ecological significance:

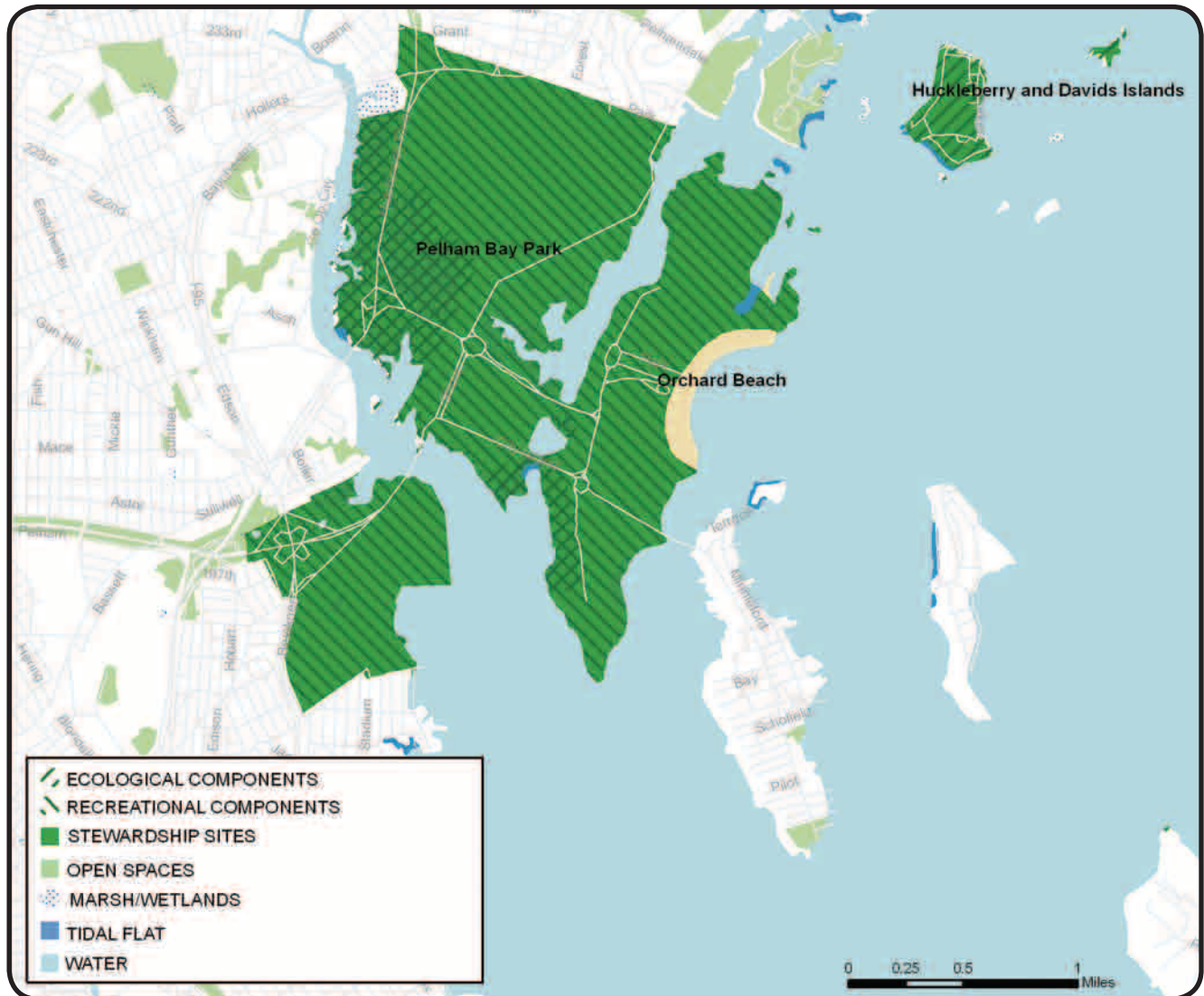
- One of the largest contiguous areas of undeveloped coastal land and the largest tidal marsh system in Westchester County
- Provides nesting and feeding habitat for native shorebirds and rare birds, including the wood sandpiper, black rail, little gull, sedge wren and yellow-headed blackbird
- Part of the Westchester County Parks System

### Recreational significance:

- Provides dockside accommodations for both power and sail boats
- Includes the only general admission swimming beach on Long Island Sound in Westchester County
- Excellent opportunities for fishing and bird watching
- Environmental education programs provide opportunities for informal nature study

# Huckleberry - Davids Islands & Pelham Bay

## Bronx and New Rochelle, New York



**Stewardship Sites:** Pelham Bay Park, Orchard Beach, Huckleberry Island and Davids Island

### Ecological significance:

- Almost 500 acres of relatively undisturbed tidal wetlands – one of the few remaining in the Bronx
- Provides productive nursery and feeding habitats for a variety of marine finfish and shellfish, including striped bass, bluefish, silversides, menhaden, winter flounder, clams, oyster, and horse-shoe crabs
- Largest colonial waterbird rookery in western Long Island Sound
- Includes areas designated as New York State Significant Coastal Fish and Wildlife Habitat

### Recreational significance:

- Largest municipal park in New York City
- Provides opportunities for unparalleled fishing, birdwatching, boating access, informal nature study, and SCUBA
- Environmental Center attracts students and visitors throughout northern New York City for educational nature study
- Includes the premier swimming beach in the Bronx
- Historically, an important commercial lobstering area
- Opportunity for potential park on Davids Island following the cleanup of toxic materials



# Alley Pond Queens and Hempstead, New York -



## **Stewardship Sites:** Alley Pond Park and Fort Totten

### **Recreational significance:**

- Environmental Center serves over 20,000 visitors annual and offers programs in ecology and life sciences for students of all ages.
- Very important spring striped bass recreational fishery
- Boating and fishing opportunities
- Provides opportunities to experience over 635 acres of forested hills, ponds, meadows, salt marshes, tidal flats and freshwater wetland habitats that are unusual in the northern Queens County and East River area
- Important winter waterfowl area provides opportunities for observation

# Manhasset Bay North Hempstead, New York -



## Stewardship Sites: Manhasset Bay and Mitchells Creek

### Ecological significance:

- A major waterfowl wintering area and exemplary embayment area
- Provides significant nursery and feeding habitat for striped bass, winter flounder, menhaden and other forage species
- Provides nesting areas for least tern and osprey
- Includes an undeveloped stream/wetland community
- Includes areas designated as New York State Significant Fish and Wildlife Habitat

### Recreational significance:

- Excellent boating access and opportunities
- Important wildlife viewing area
- Includes remnant open space in a densely populated area

*Pending passage of the federal Long Island Sound Stewardship Act, delineations of stewardship sites below mean high water may need to be redrawn.*



# Hempstead Harbor North Hempstead, New York -



**Stewardship Sites:** Hempstead Harbor, Morgan Park, Tappen Beach, and Sands Point Preserve

**Recreational significance:**

- The numerous preserves surrounding the Harbor offer public access to natural areas and educational opportunities
- Access to public beaches, walkways and a marina
- Additional trails and a boat launching area planned for the southern end of the Harbor
- Designated by Audubon New York as an Important Bird Area
- Observation of at least 10 Osprey nests

**LEGEND**

- ECOLOGICAL COMPONENTS
- RECREATIONAL COMPONENTS
- STEWARDSHIP SITES
- OPEN SPACES
- MARSH/WETLANDS
- TIDAL FLAT
- WATER

**Map Labels:** Mill Neck Preserve County Park, Centre Island Town Park & Beach, Oyster Bay National Wildlife Refuge, Shu Swamp Nature Preserve, Beekman Beach, The Waterfront Center, Caumsett State Park (see pg 31).

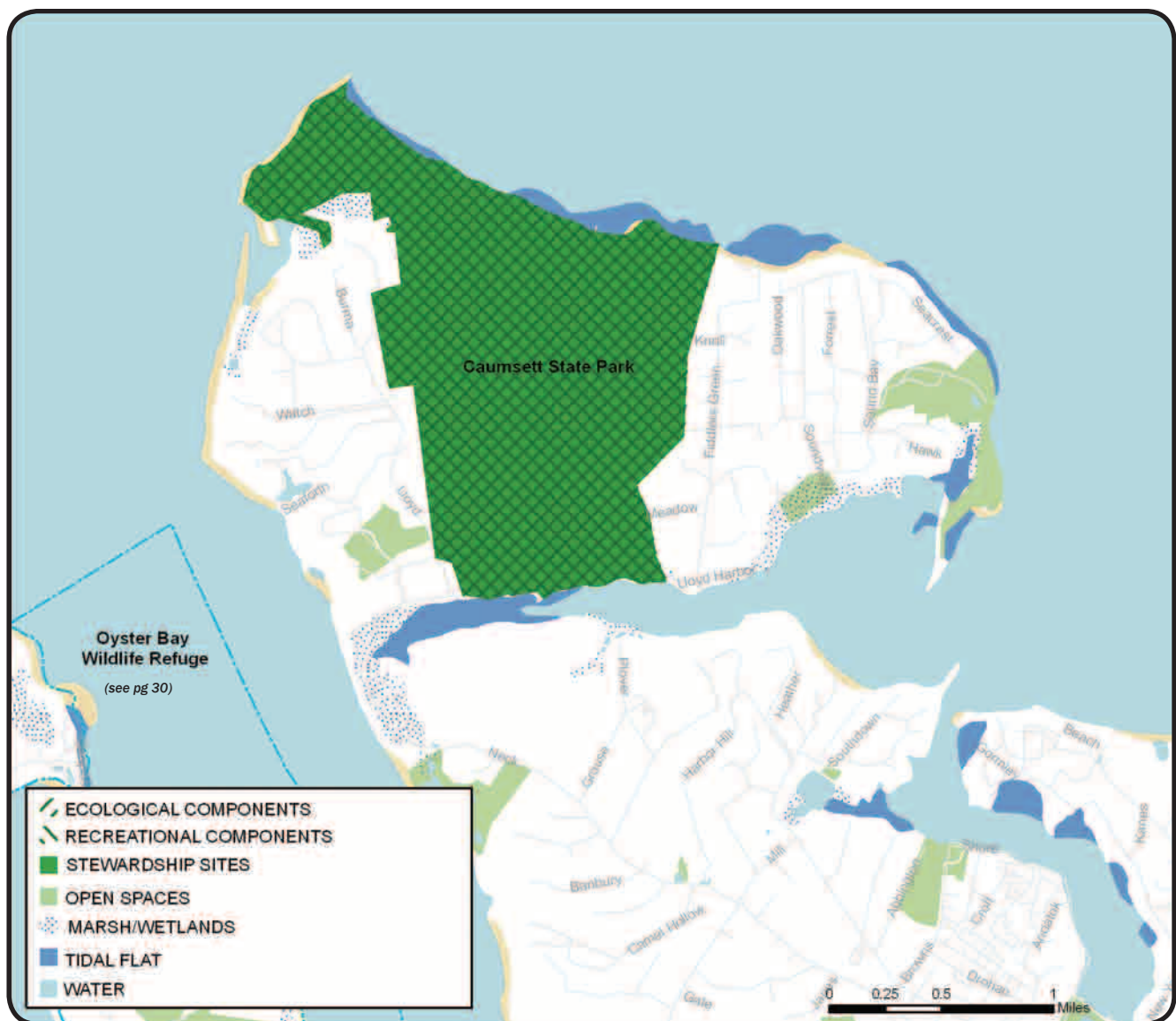
**Scale:** 0 0.25 0.5 1 Miles

**Ecological significance:**

- Recreational significance:**

- Pending passage of the federal Long Island Sound Stewardship Act, delineations of stewardship sites below mean high water may need to be redrawn.***

# Lloyd Neck Huntington, New York -



## Stewardship Sites: Caumsett State Park

### Ecological significance:

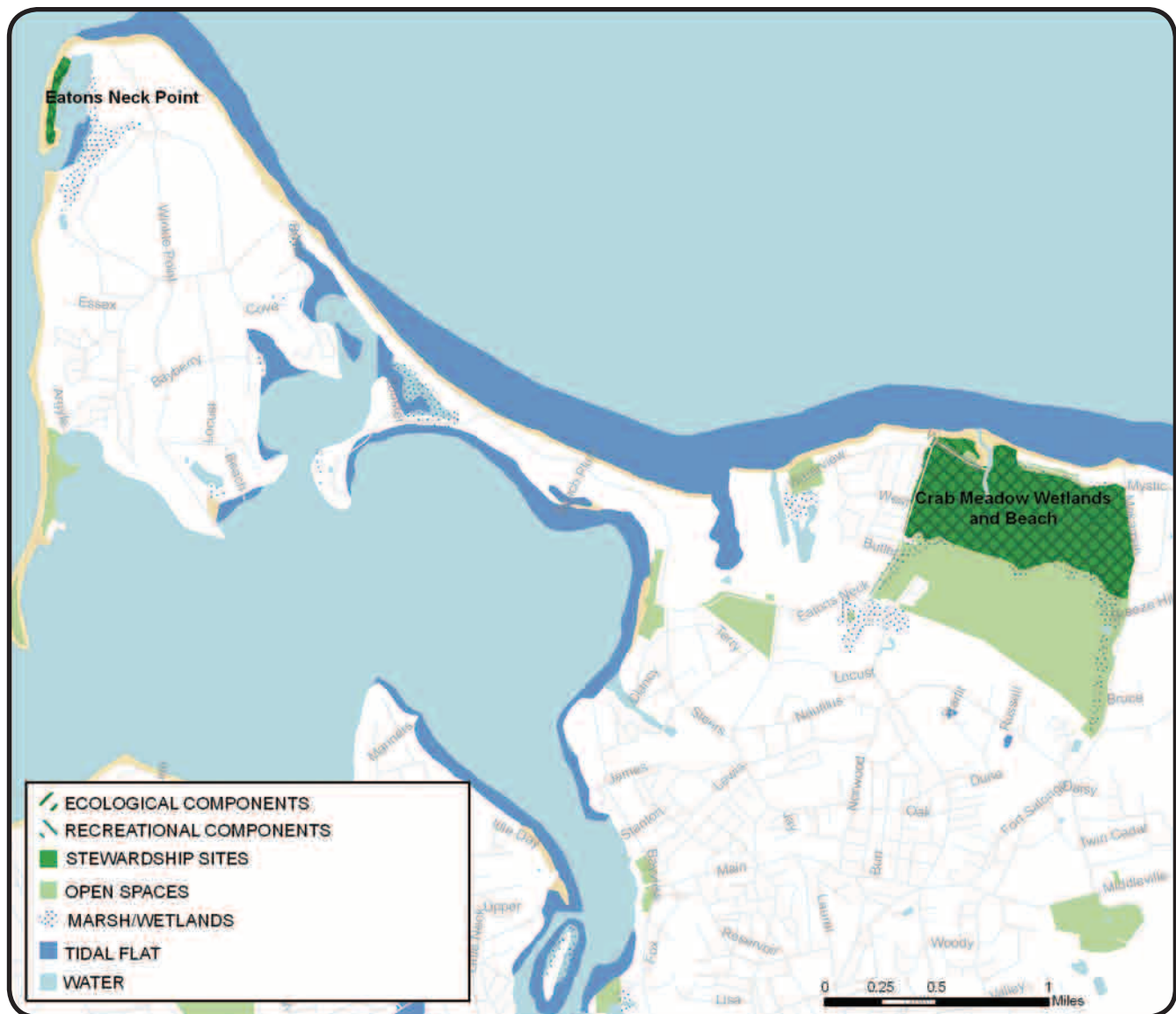
- Largest and most diverse coastal forest on the north shore of Long Island, including coastal oak-hickory forest, oak tulip tree forest, tidal mudflats, a maritime beach, mature woodlands, a freshwater pond, bluffs and open fields
- Includes a site designated as a Bird Conservation Area
- Includes areas designated as New York State Significant Coastal Fish and Wildlife Habitat
- Provides forage areas for least terns, common terns, and black skimmers

### Recreational significance:

- Features miles of bridle paths, hiking, biking, cross-country skiing, and nature trails that provide excellent wildlife viewing opportunities
- Provides access for fishing, swimming and SCUBA diving
- Recreational fishing areas
- Outstanding environmental programs and field studies



## Crab Meadow Huntington and Smithtown, New York -



### **Stewardship Sites:** Crab Meadow Wetlands and Beach and Eatons Neck Point

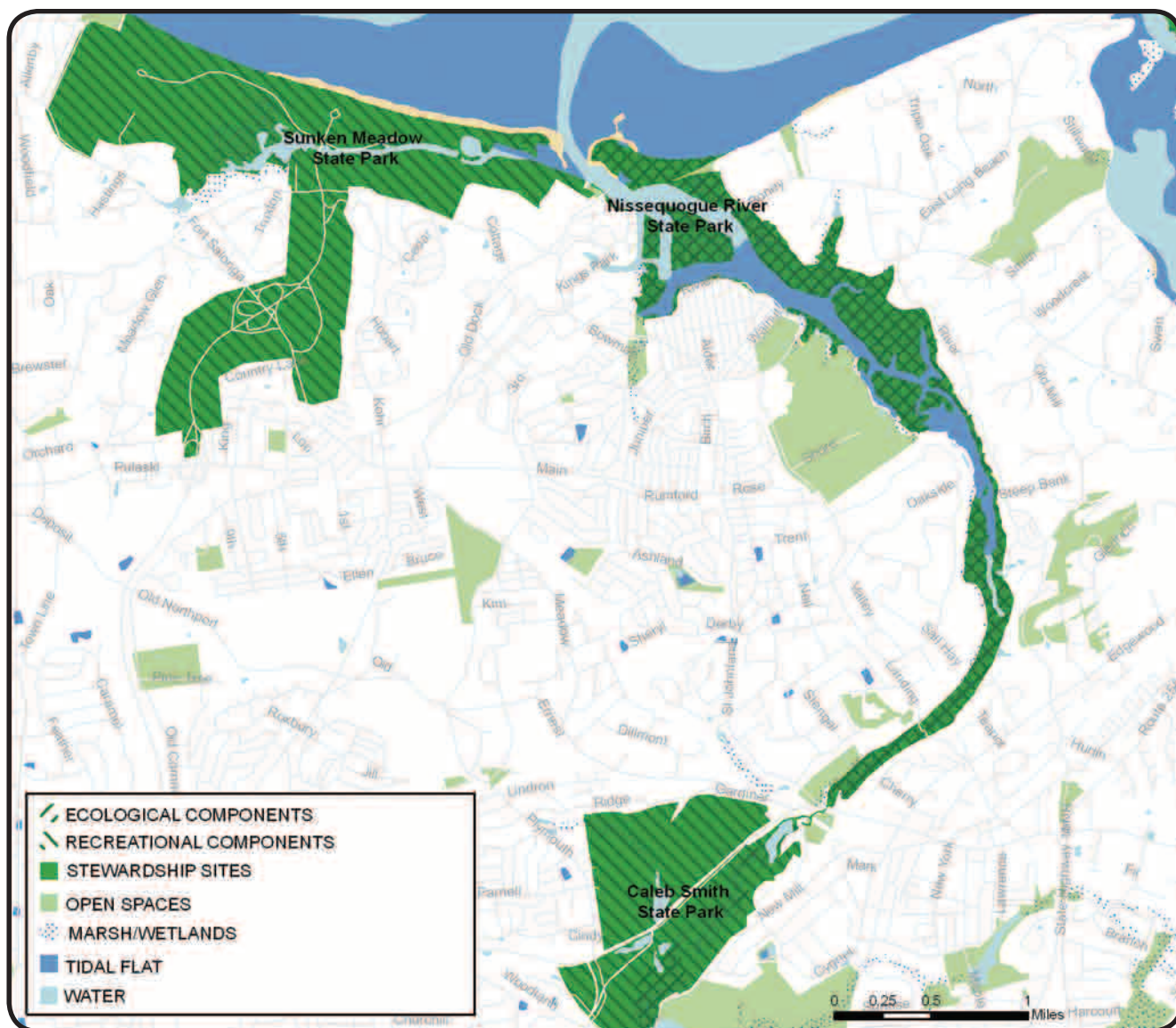
#### **Ecological significance:**

- One of the few large areas (approximately 300 acres) of undeveloped salt marsh ecosystems remaining on the north shore of Long Island
- Includes areas designated as New York State Significant Coastal Fish and Wildlife Habitat
- Important nesting area for piping plovers and least terns

#### **Recreational significance:**

- Includes two boat ramps
- Includes an important swimming beach and a popular surf casting fishing site
- Coastal marine education center may be developed

# Nissequogue River Smithtown, New York -



## **Stewardship Sites:** Nissequogue River, Caleb Smith, and Sunken Meadow State Parks

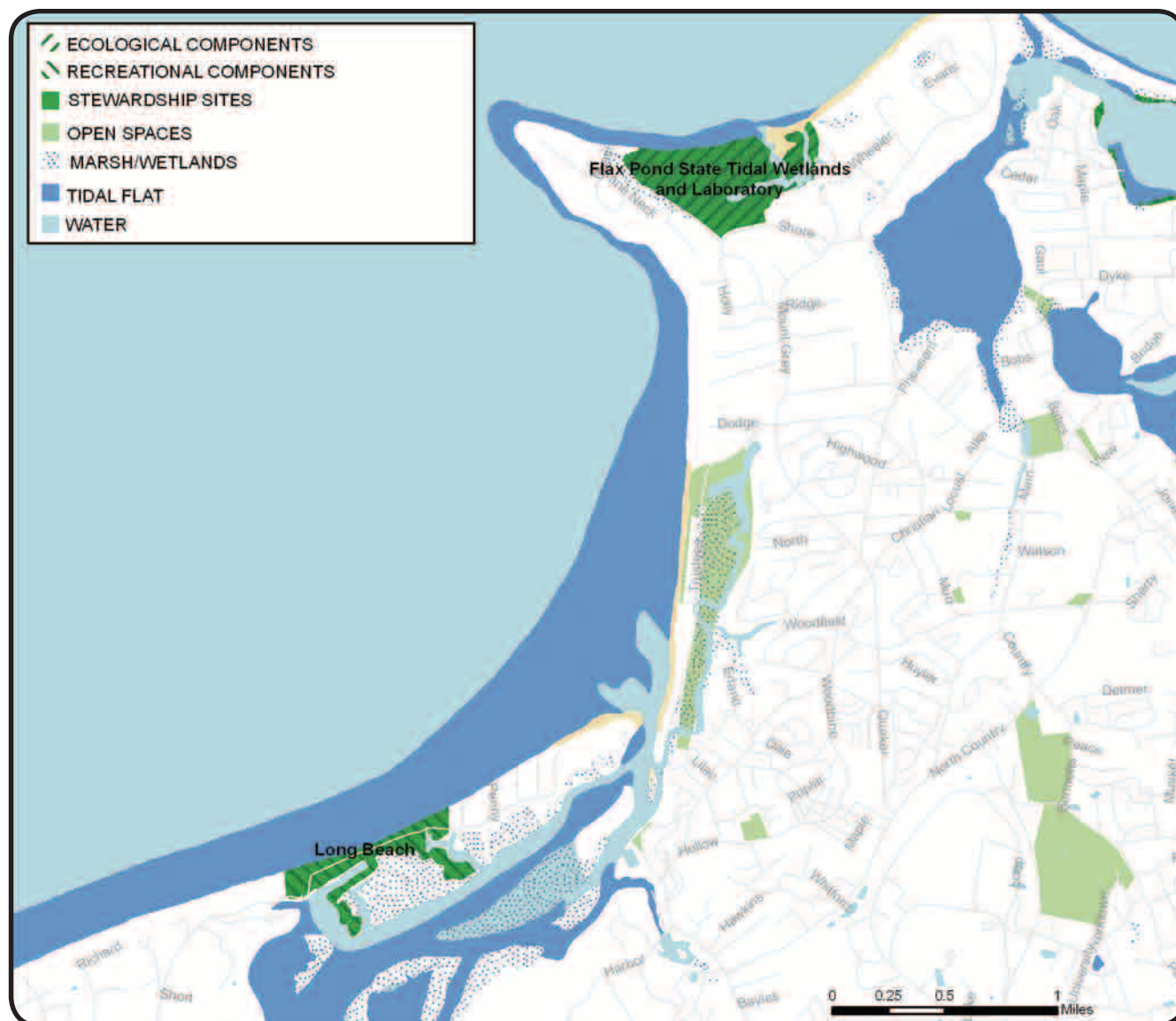
### **Ecological significance:**

- Exemplary riverine habitat – the only major tidal river draining into Long Island Sound where the coastal portion remains in relatively undisturbed condition
- One of the largest coastal wetlands on the north shore
- Includes diverse habitats, including intertidal mudflats, brackish tidal wetlands, freshwater wetlands, a rare red maple black gum swamp and coastal forests
- Supports a sea-run fishery for brown trout
- Includes areas designated as New York State Significant Coastal Fish and Wildlife Habitat
- Includes a 100-acre site designated as a Bird Conservation Area

### **Recreational significance:**

- Fisheries resources support recreational fishing of regional significance
- Excellent fishing and boating access and wildlife viewing opportunities
- Includes hiking trails that are part of the Greenbelt Trail
- Important swimming beach
- Coastal education opportunities at nature center and museum

# Stony Brook Harbor Brookhaven, New York -



**Stewardship Sites:** Flax Pond State Tidal Wetlands and Laboratory and Long Beach

## Ecological significance:

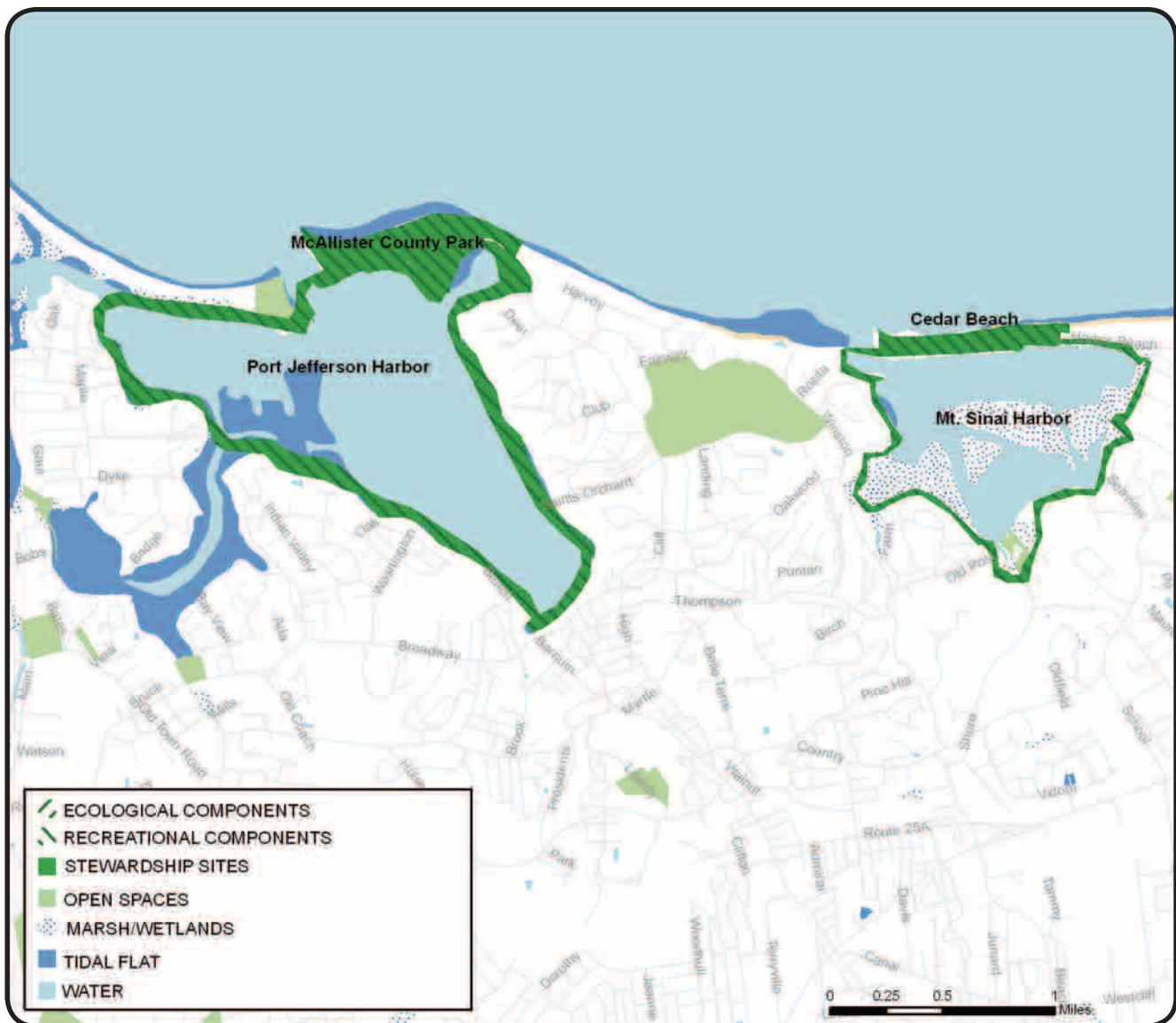
- Over a 1,000 acres of diverse tidal wetlands
- Provides habitat for diverse species of colonial waterbirds
- Provides important spawning sites for horseshoe crabs
- Research and education marine laboratory
- Includes areas designated as New York State Significant Coastal Fish and Wildlife Habitat

## Recreational significance:

- Excellent swimming, boating and fishing access
- New opportunities for ecological restoration, environmental education and expansion of recreational opportunities exist



# Mt Sinai-Port Jefferson Harbor Brookhaven, New York -



**Stewardship Sites:** McAllister County Park, Cedar Beach, and Mt. Sinai and Port Jefferson Harbors

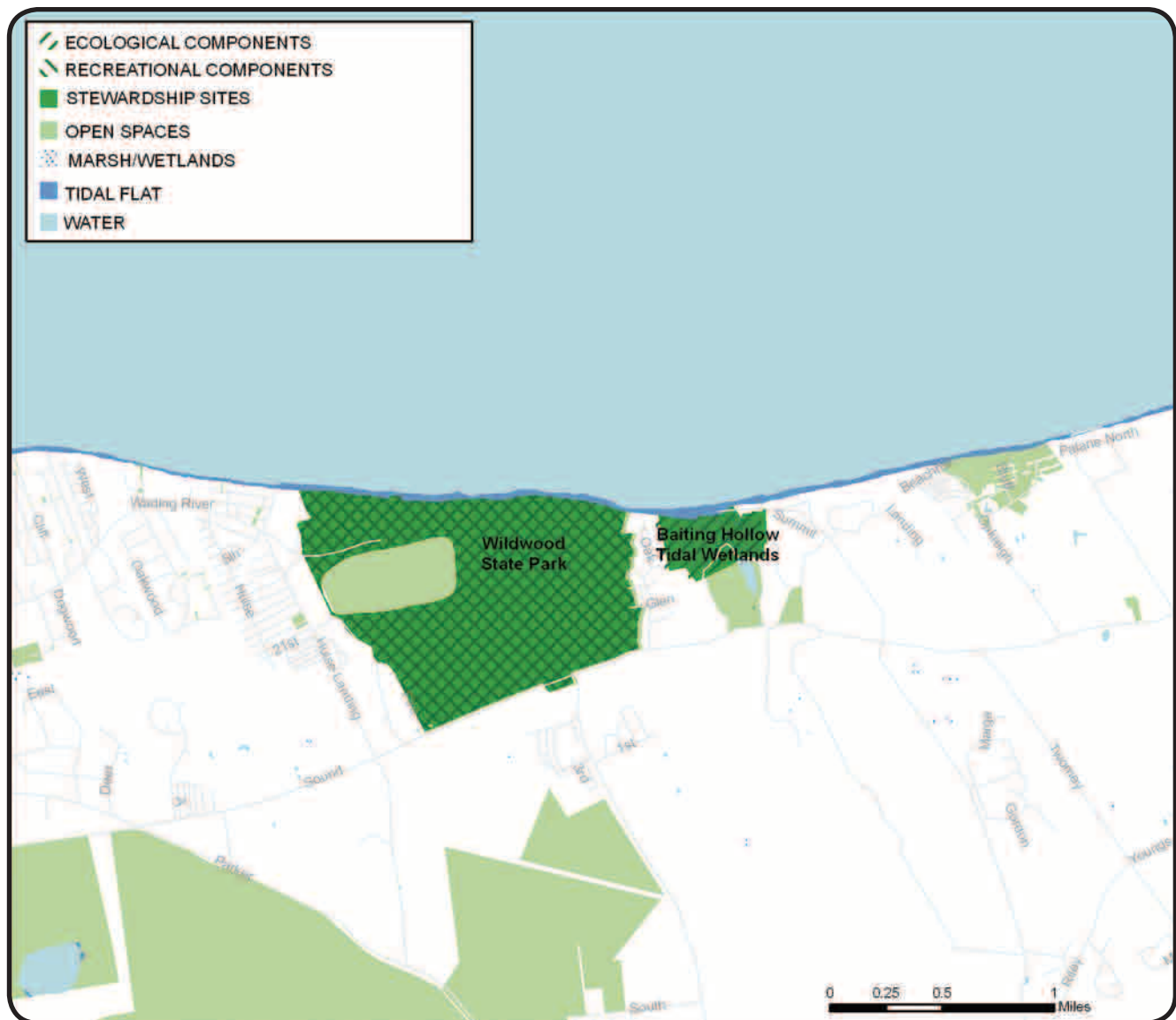
**Recreational significance:**

- Exemplary boating opportunities provided by eight marinas and three boat ramps
- Includes excellent swimming beaches and great access for saltwater fishing
- Coastal education nature center
- Observation of wading birds and waterfowl including piping plovers, least terns, and common terns
- Important fishery for shellfish (e.g., hard and soft clams) and finfish (e.g., winter flounder)
- Includes areas designated as New York State Significant Coastal Fish and Wildlife Habitat
- Includes areas designated as part of the National Coastal Barrier Resources System

*Pending passage of the federal Long Island Sound Stewardship Act, delineations of stewardship sites below mean high water may need to be redrawn.*



# Shoreham - Wading River Riverhead, New York -



## **Stewardship Sites:** Wildwood State Park and Baiting Hollow Tidal Wetlands

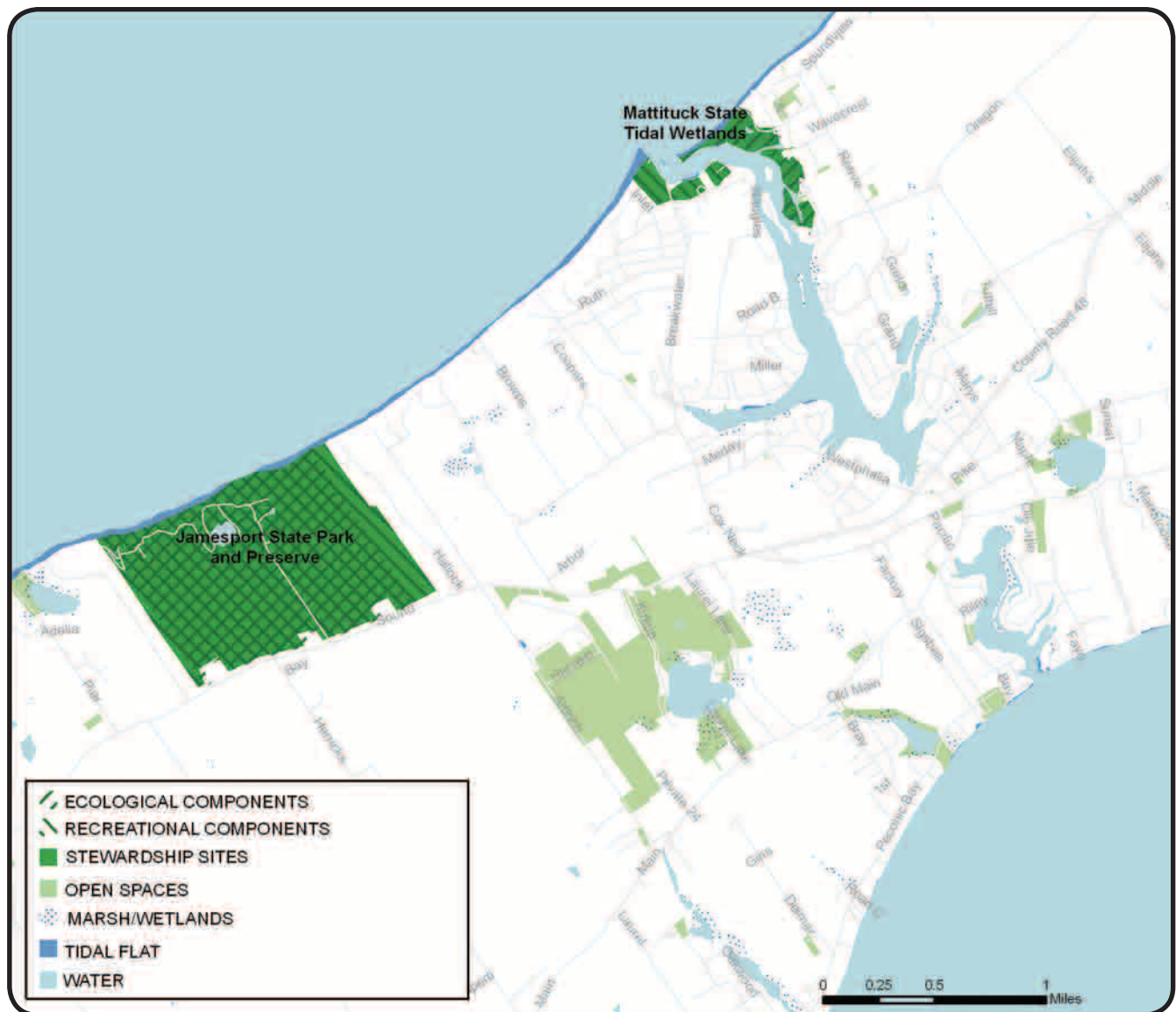
### **Ecological significance:**

- Relatively undisturbed salt marsh and maritime beach complex that are rare on the north shore of Long Island in Suffolk County
- An important nesting site for piping plover and least tern
- Includes areas designated as New York State Significant Coastal Fish and Wildlife Habitat
- Includes over 15 acres of barrier beach
- Provides habitat for silverweed, a state-threatened plant species, and saltmarsh bulrush, a state-endangered plant species
- Exemplary bluff habitat supports a globally-rare maritime beech forest
- Sand shoal habitat supports sandlance, which is a food source for tern populations

### **Recreational significance:**

- Excellent swimming beaches, over 11 miles of hiking trails, camping opportunities and significant saltwater fishing access
- Includes a boat ramp for small boats to enter the Sound
- Potential areas for public access and recreational opportunities exist

## Jamesport - Mattituck Creek Southold, New York -



**Stewardship Sites:** Jamesport State Park and Preserve and Mattituck State Tidal Wetlands and Waterways Access

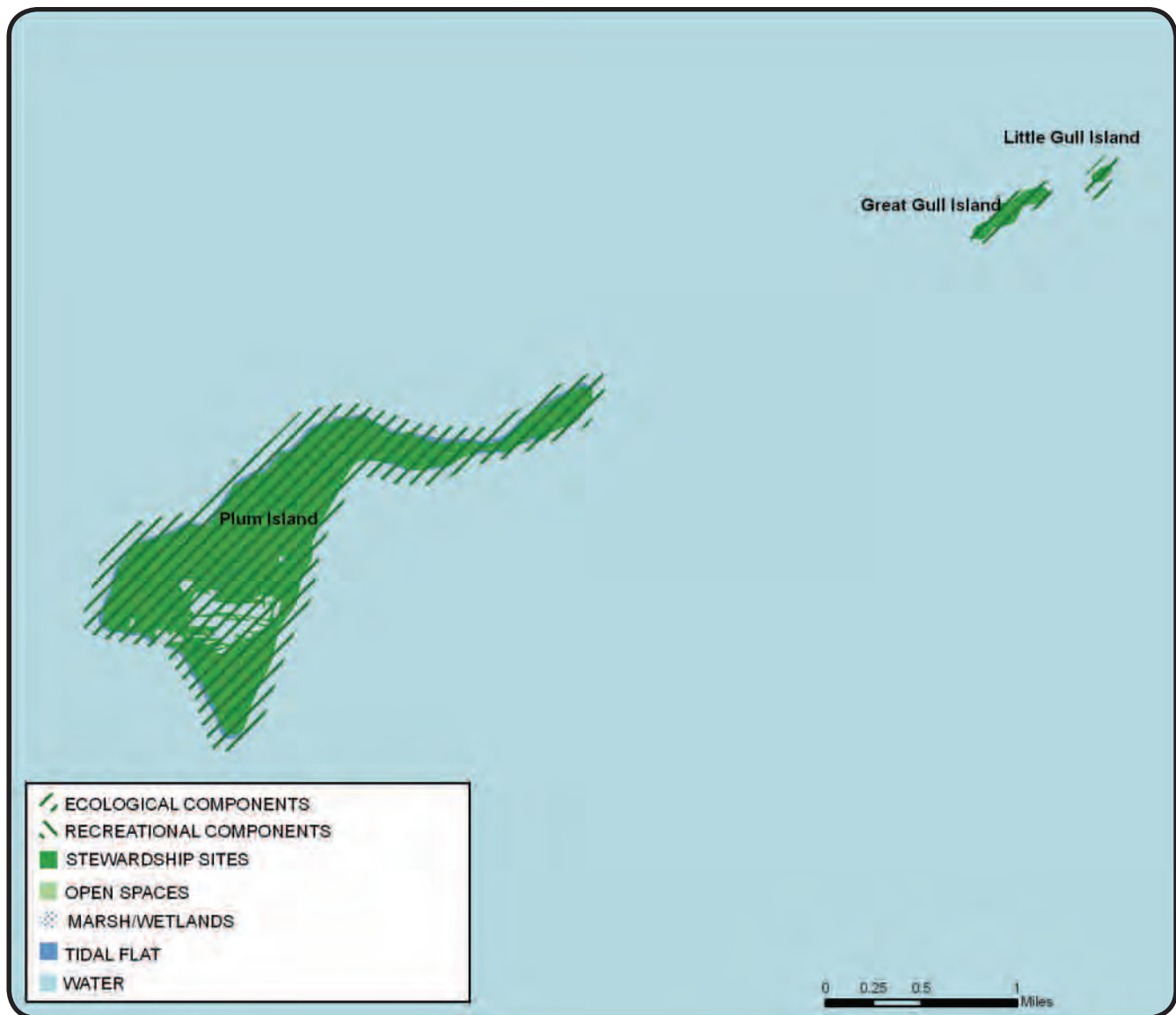
### Ecological significance:

- Includes a variety of freshwater wetland types that are not typical on the north shore of Long Island
- Undisturbed tidal wetlands provide habitat for nesting osprey
- Includes areas designated as New York State Significant Coastal Fish and Wildlife Habitat

### Recreational significance:

- State-owned properties will provide public access opportunities for all state residents in the future
- Includes two municipal boat ramps
- Excellent swimming, fishing, and SCUBA diving opportunities
- Includes newly-renovated facilities
- Only protected harbor for small boats (for refuge and for mooring/access) from Mt. Sinai to Orient Point

## Plum & Gull Islands Southold, New York -



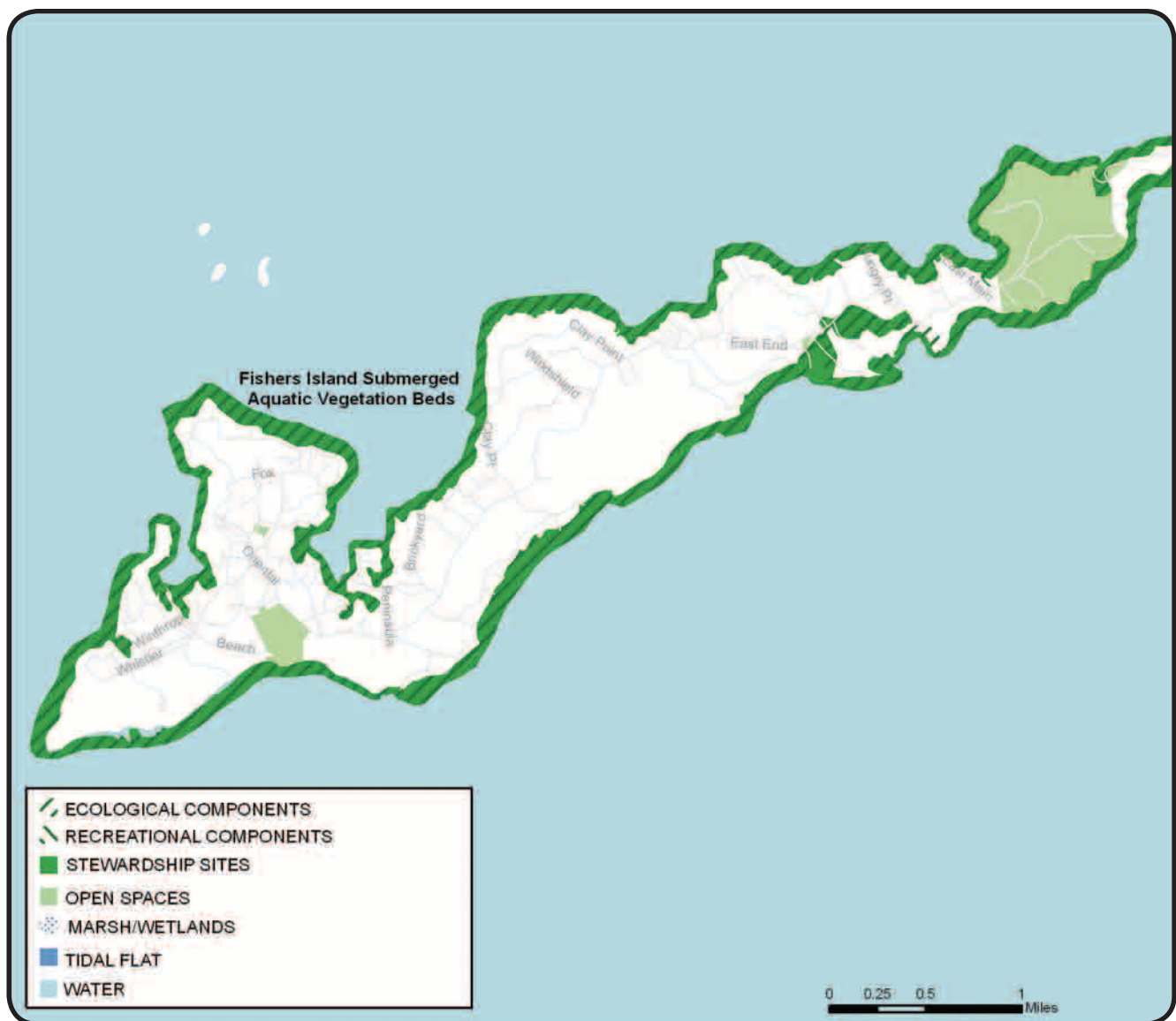
### **Stewardship Sites:** Plum Island, Little Gull Island, and Great Gull Island

#### **Ecological significance:**

- Exemplary colonial waterbird habitat, including sites that are of national – if not international – significance
- Small rocky islets dominated by grassy and herbaceous vegetation
- Colonized by over 6,000 pairs of common tern and approximately 1,200 pairs of roseate tern, making this the second largest breeding population of this endangered species in North America
- Identified by the USFWS as a Significant Coastal Habitat

*Pending passage of the federal Long Island Sound Stewardship Act, delineations of stewardship sites below mean high water may need to be redrawn.*

## Fishers Island Coastline Southold, New York -



### **Stewardship Site:** Fishers Island Submerged Aquatic Vegetation Beds

#### **Ecological significance:**

- Exemplary submerged aquatic vegetation habitat and rocky reef habitat
- Includes 98% of the eelgrass meadows in NY waters of Long Island Sound
- Provides critical habitat for bay scallops
- Designated as New York State Significant Coastal Fish and Wildlife Habitat

*Pending passage of the federal Long Island Sound Stewardship Act, delineations of stewardship sites below mean high water may need to be redrawn.*





# LONG ISLAND SOUND STUDY

A PARTNERSHIP TO RESTORE AND PROTECT THE SOUND

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## 2003 Long Island Sound Agreement

On Dec. 4, 2002, officials from New York, Connecticut, and the federal government signed the Long Island Sound 2003 agreement. The agreement builds upon the goals of the 1994 Comprehensive Conservation and Management Plan by adding 30 new goals and targets to restore Long Island Sound.



2003 Agreement Signed. Commissioner Arthur J. Rocque of the Connecticut Department of Environmental Protection, and Commissioner Erin Crotty of the New York State Department of Environmental Conservation sign the 2003 Long Island Sound Agreement at the Maritime Aquarium in Norwalk. Also signing the document were Robert W. Varney, Administrator of the New England Region of the U.S. Environmental Protection Agency, and Jane M. Kenny, administrator of EPA Region II, which includes New York.

## Goals and Targets of the 2003 Long Island Sound Agreement

### I. HYPOXIA – Eliminate the adverse impacts of hypoxia resulting from human activities.

1. By 2014, achieve a 58.5 percent reduction in the total enriched load of nitrogen to Long Island Sound from point and nonpoint sources within the New York and Connecticut portions of the watershed, as defined by the December 2000 document – A Total Maximum Daily Load Analysis to Achieve Water Quality Standards for Dissolved Oxygen in Long Island Sound.
2. By 2003, establish Phase IV nitrogen reduction agreements to address atmospheric deposition and watershed management for portions of the Long Island Sound watershed outside of New York and Connecticut.

### II. PATHOGENS – Increase the area for shellfish harvesting and eliminate bathing beach closures while maintaining protection of human health.

1. By 2003, nominate vessel no-discharge areas for the Pawcatuck and Mystic Rivers in Connecticut and for all the Long Island Sound embayments in New York. By 2005, nominate vessel no-discharge areas in two additional areas in Connecticut.
2. By 2010, decrease the acreage closed year-round to shellfishing due to pathogen indicators by 10 percent compared to 2000 levels.
3. By 2010, minimize chronic bathing beach closures in Long Island Sound due to pathogen indicators, with a goal of eliminating all chronic closures (closed for at least three days per year for at least three of the last five years).

### III. TOXIC SUBSTANCES – Eliminate toxicity or bioaccumulation impacts on living resources by reducing contaminant inputs and cleaning up contaminated sites, and manage risk to humans from seafood consumption.

1. By 2004, EPA, in conjunction with the Army Corps of Engineers, will complete the Environmental Impact Statement for the designation of dredged material disposal sites in central and western Long Island Sound and, by 2008, will complete the EIS for designation of dredged material disposal sites in eastern Long Island Sound.
2. By 2003, update the Long Island Sound Contaminants of Concern list after considering National Coastal Assessment monitoring results and other sources of data. By 2005, evaluate current contaminant monitoring and control programs and identify strategies to address priority issues.

3. By 2003, New York and Connecticut will meet to jointly review their approaches for Long Island Sound fish consumption advisories and to discuss a process to achieve the goal of consistent fish consumption advisories for Long Island Sound.

**IV. LIVING RESOURCES AND THEIR HABITATS** – Assure a healthy ecosystem with balanced and diverse populations of indigenous plants and animals, maintain or increase the abundance and distribution of harvestable species, and restore the ecological functions of degraded and lost habitats.

1. By 2003, complete the mapping of eelgrass in the Long Island Sound area to determine trends. Continue to promote investigations and research into determining the impacts of nitrogen upon the degradation of aquatic habitats (i.e., loss of eelgrass, increases in macroalgae and benthic algae) in shallow embayments and bays in Long Island Sound.

2. By 2005, characterize the scope and rate of tidal wetland losses in the Sound and promote research that will determine to what degree accelerated sea level rise, sediment supply disruptions, or other factors are responsible for the loss of habitat that is critical to the Sound's birds, finfish, and overall productivity.

3. By 2004, complete research and monitoring studies into the causes of the lobster mortality event in Long Island Sound and identify any management measures that could be implemented to prevent future mortality.

4. By 2003, identify critical issues (in addition to those in actions IV. 1-3) related to the management and conservation of living resources (such as fish and birds) and their habitats, and develop strategies to improve conditions, as appropriate.

5. By 2003, produce a list of the invasive species of concern in Long Island Sound.

6. Restore at least 2000 acres of habitat and 100 river miles for fish passage during the ten-year period from 1998 to 2008 and monitor these sites to confirm restoration progress over time.

7. By 2004, identify sites of outstanding and exemplary scientific, educational, or biological value.

**V. OPEN SPACE AND PUBLIC ACCESS** – Assure continued public access to Long Island Sound for aesthetic, recreational, cultural, and historical purposes and continue to identify and acquire open spaces that are essential for the ecological health and balance of the Sound.

1. Continue state land protection initiatives to acquire ecologically and recreationally significant properties along the coast and increase public access opportunities to shoreline locations.

2. By 2003, identify a coordinated strategy for developing a Long Island Sound Stewardship System that:

a. promotes conservation of open space, landscapes, and ecosystems;

b. improves access to the Sound;

c. establishes a listing of existing open space properties and prioritizes property types for natural resource conservation and natural resource-based outdoor recreation;

d. incorporates the sites of outstanding and exemplary scientific, educational, or biological value identified by Action IV. 7; and

e. promotes federal, state, local, and private funding for open space projects.

**VI. WATERSHED MANAGEMENT** – Assure a viable Long Island Sound watershed that supports vibrant and healthy aquatic life, and minimizes the negative effects of erosion, sedimentation, and flooding on the Sound and its tributaries and embayments.

1. By 2010, Connecticut and New York will work toward a goal of having 50 percent of their respective areas in the watershed developing or implementing watershed restoration strategies.

3. By 2004, Connecticut and New York will assess the amount of riparian forest buffer in their portions of the watershed using available land use/land cover data. Through watershed planning efforts, the states will encourage the establishment of targets to expand the percentage of riverine miles with forested buffers.

**VII. PUBLIC EDUCATION AND COMMUNITY INVOLVEMENT** – Promote an informed and educated constituency involved in community decisions affecting the ecological health of Long Island Sound and its living resources.

1. Continue to report every two years on the health of Long Island Sound through ecological indicators, including measures of living resources, water quality, landscape changes, and community involvement.

2. Continue to support efforts to develop and establish Long Island Sound curricula for primary and secondary schools through grant programs such as the LISS Small Grants Program.

3. Through the use of initiatives such as Project WET, Project SEARCH, the Long Island Sound License Plate Program, and the LISS Small Grants Program, offer Long Island Sound field and learning experiences to as many school children as possible, with a goal of reaching 50 percent of the school children within the Connecticut and New York portions of the watershed by 2010.

4. By 2004, develop a public awareness campaign to help control the introduction, spread, and impact of invasive species.

5. Expand the Citizen Advisory Committee to involve more constituencies and continue its role in evaluating CCMP implementation and supporting public awareness of Long Island Sound.

**VIII. PARTNERSHIPS** – Support the LISS Management Conference partnership in communicating and coordinating action to restore and protect the Sound among federal, state, interstate, and local governments, educational institutions, private nonprofit organizations, the regulated community, and the public.

1. Continue federal and state support and continue to build partnerships at all levels to implement the CCMP for Long Island Sound and to effect the specific elements in this Agreement.
2. In 2002, provide support to the Scientific and Technical Advisory Committee and Citizen Advisory Committee to enhance their role in building and expanding partnerships.
3. Continue support for the EPA Long Island Sound Office at a level necessary to coordinate and achieve the goals in this Agreement.
4. By 2005, reconvene to assess progress toward meeting the CCMP goals and the targets in this Agreement and consider any additional actions necessary.

To read about progress with the Comprehensive Conservation and Management Plan, see our [Long Island Sound Indicators](#) and [Sound Health](#) report.

Tide Charts: CT | NY

Current Water Conditions

Marine Forecast

RSS Feed

Phone: 203-977-1541

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## Bourdeau, Jonathan

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**From:** john.dugan@gsa.gov  
**Sent:** Wednesday, June 02, 2010 4:52 PM  
**To:** Jenkins, Josh; Stelmack, Mark  
**Cc:** phil.youngberg@gsa.gov  
**Subject:** Fw: Plum Island EIS  
**Attachments:** Stewardship\_Atlas06.zip

FYI

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John L. Dugan  
Real Property Utilization & Disposal Division  
U.S. General Services Administration  
10 Causeway Street, Room 925  
Boston, MA 02222  
Office: 617.565.5709  
Cell: 617.921.0431  
Fax: 617.565.5720

----- Forwarded by John L. Dugan/1P/R01/GSA/GOV on 06/02/2010 04:52 PM -----

[Nancy18b@aol.com](mailto:Nancy18b@aol.com)

06/02/2010 04:51 PM

To [john.dugan@gsa.gov](mailto:john.dugan@gsa.gov)  
cc  
Subject Plum Island EIS

Dear Mr. Dugan,

On behalf of the entire Citizens Advisory Committee (CAC) of the Long Island Sound study, please include in the record of the Plum Island EIS the attached scoping comment letter, the CAC list of members, as well as the other supporting documents attached and referred to in our comments. My Co-chair and I look forward to your response.

Many thanks,

Nancy Seligson

New York CAC Co-Chair, LISS

# CITIZENS ADVISORY COMMITTEE

## OF THE LONG ISLAND SOUND STUDY

Website: <http://www.longislandsoundstudy.net>

June 2, 2010

Mr. Phil Youngberg, Environmental Manager  
c/o Mr. John Dugan  
General Services Administration (GSA)  
10 Causeway Street  
Room 925  
Boston, MA 02222

Re: Comments of the Citizen Advisory Committee of the Long Island Sound Study on the EIS for the Sale of Plum Island, New York.

Dear Mr. Youngberg:

On behalf of the Citizens Advisory Committee (CAC) of the Long Island Sound Study (LISS), we submit this letter to be included in the record of the Environmental Impact Statement (EIS) you are preparing for the proposed sale of Plum Island, New York. We write to urge you to construct any sale of Plum Island in such a way that the large undeveloped portion of the island remains permanently conserved and preserved, consistent with the designation of Plum Island as the core of a Long Island Sound Stewardship Area. We request that your DEIS is informed by a thorough ecological survey of the island over the course of at least one year. Finally, we also ask you to carefully review your obligations pursuant to the National Environmental Policy Act and consider a "no sale" alternative.

The CAC represents a broad array of citizen, environmental and business organizations that has long advocated for the restoration of Long Island Sound. We advise and advocate for the implementation of the Comprehensive Conservation and Management Plan of the Sound and are part of the LISS, which was formed in 1985 by the Environmental Protection Agency, New York, and Connecticut, and includes several participating federal agencies. We have attached a list of the CAC members.

The LISS, through a Resolution of the Policy Committee dated September 28, 2006 (attached), formally adopted the policy to achieve the permanent protection, restoration, and conservation of Plum Island's vast undeveloped landscape and to increase public access to appropriate recreation and education. This action was a part of the Stewardship Initiative, in which the LISS formally endorsed thirty-three inaugural Stewardship Areas around the Sound with significant ecological and/or recreational values. Plum Island is part of an exemplary stewardship area – a crown jewel – and is home to a number of unspoiled habitat types and federally endangered species. (See attached Stewardship Site Atlas). We remind you that the LISS endorsement was formally signed by all the members of its Policy Committee including the Region I and II Regional EPA Administrators and the Environmental Commissioners of New York and Connecticut, and represents a strong and unequivocal governmental interest in ensuring the conservation of the undeveloped portions of Plum Island.

Ornithology experts from Audubon New York, a CAC member, document significant natural resources on the island that warrant protection. Supporting the Stewardship Site designation, Audubon New York has designated the island as an Important Bird Area because it contains

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Comment [ts1]: Is this a policy or a plan? Does it refer to the CCMP in the previous paragraph?

critical bird habitat. To better document bird usage, bird surveys were conducted over the past three years during the breeding, winter, and migration seasons. Over 100 bird species have been documented on Plum Island and adjacent coastal waters. In 2009, seven active Osprey nests and an active Bank Swallow colony, a bird species on the decline in New York, were noted. Piping Plovers, a federally threatened species, utilize the shoreline habitat for breeding and foraging. Several dozen Roseate Terns, a federally endangered species, and several hundred Common Terns, a New York State threatened species, also use the island. The waters surrounding Plum Island are rich in nutrients and are vital feeding and courting grounds for birds such as terns and waterfowl. Plum Island likely provides critical stopover habitat for many fall migrant songbird and shorebird species, but this needs better documentation. The recent bird surveys have provided a snapshot of the ecological value of Plum Island to bird species, and it is likely that far more species depend on it than we are know. Moreover, CAC members are not aware that any comprehensive community survey has been completed for the various shrub, grassland, wetlands and forest habitats on the island. Nonetheless, one indication of the riches waiting to be documented is reflected by the Plum Island Coalition, March 2010 report. This report notes the existence of rare plant species apparently based on casual observations (See attached at page 3). A thorough and comprehensive biological and ecological inventory of the many island habitats during at least one full year is needed to adequately document significant species and natural biological communities and resources to guide any sale and future uses.

Comment [ts2]: use "aware" in next sentence

Given the strong expressed interest on the part of federal and state governments, the entire CAC and many other NGOs in conserving this unique Long Island Sound asset, we ask you to focus on two priorities in preparing the DEIS associated with this proposed sale.

First, because of the identified ecological importance of this property, and the fact that it has been largely inaccessible for decades and the subject of very limited bird surveys, **we believe your agency must conduct a survey over the course of at least a full year to accurately inventory and assess the wildlife, biological and ecological functions, and potential restoration opportunities on the island and associated marine environment.** Also, a comprehensive analysis is needed of the level of appropriate public uses that would be feasible, while protecting critical environmental resources. Please extend your timeline for preparing the EIS and take a minimum of twelve months to collect critical data on the island.

Second, **if you determine that a sale is required by law, we urge you to identify and adopt as the preferred alternative a creative adaptive re-use sale option that achieves permanent protection of the approximately ninety percent undeveloped portion of the island, while allowing the developed portion to be sold to the highest bidder for appropriate future commercial or other development uses, subject to a thorough environmental contamination assessment. In addition, public access to the island must be provided by reserving some form of public access rights from the associated Orient Point property.** To achieve this end, the undeveloped portions of the island should be transferred or sold separately to an organization or agency whose mission is to conserve, manage and restore the natural features of this island, subject to strict conservation restrictions. Ultimately, we believe the undeveloped portion of the island should become part of the National Wildlife Refuge system administered by the U.S. Fish and Wildlife Service (USFWS). As you are aware, the USFWS is authorized to accept excess and surplus federal real property from the GSA pursuant to Part 340 of USFWS Manual Number 091. We believe construction of this sale so that the undeveloped portion of the property is transferred to USFWS control should be the preferred alternative. At a minimum, we urge you to construct the preferred alternative so that the conservation sale or transfer of the

undeveloped portion of the island guarantees permanent conservation of the natural elements of the island.

In addition, we ask that the EIS incorporate a comprehensive assessment of toxic and hazardous contamination as well as potential health threats associated with the existing disease research facility. This assessment should focus on both the existing building structures and developed infrastructure of the island as well as potentially contaminated natural features, including but not limited to, the island's soil, groundwater and associated wetland habitats. This information is essential to develop a rigorous remediation plan. Moreover,, the EIS should analyze the carrying capacity of groundwater on the island and assess the impact of increased groundwater demand and interruption on groundwater discharge that development alternatives would have on this critical resource.

The CAC also request that the GSA communicate important decisions and milestones associated with this EIS process in an open and transparent fashion. For example, as decisions related to an amended timeline, alternatives to be examined and biological surveys are made, please email these updates to our co-chairs and all other interested public parties and post the decisions and updates to your website.

While the GSA may be tempted to treat Plum Island like any other "surplus" property and prepare the entire island for sale to the highest bidder, selecting such an alternative will run counter to the expressed federal and state policies and interests expressed by the inclusion of this site within our Long Island Sound Stewardship system. Such a "high bid" total sale will likely result in purchase of the island by private development interests. This is counter to the purpose and intent of the LISS Stewardship Initiative. The highest levels of state and federal government have endorsed the Long Island Sound Stewardship system. We now ask that your EIS recommend a creative alternative that supports this core public and governmental interest and assures the permanent protection of the important open habitat areas on Plum Island. We look forward to your response to these comments, open communication and working with the GSA as this process unfolds.

Yours truly,

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Cc: Congressman Tim Bishop  
Senator Charles Schumer  
Senator Kirsten Gillebrand  
Congressman Joe Courtney  
Congresswoman Rosa DeLauro  
Congressman Jim Himes  
Senator Chris Dodd  
Senator Joe Lieberman  
Supervisor Scott Russell, Town of Southold, New York



# CITIZENS ADVISORY COMMITTEE

## OF THE LONG ISLAND SOUND STUDY

Website: <http://www.longislandsoundstudy.net>

### Membership List

Nancy Seligson, New York Co-Chair  
Curtis Johnson, Connecticut Co-Chair  
Martin Garrell, Secretary

Patricia Aitken  
John Atkin  
Patrick Augustine  
Allen Berrien  
Sandy Breslin  
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David Miller  
Maureen Dolan Murphy  
Daniel Natchez  
Joel Rinebold  
Dianne Selditch  
Daniel Snyder  
Eric Swenson  
Howard Weiss  
Grant Westerson  
Jennifer Wilson-Pines  
Joel Ziev

Councilwoman, Town of Mamaroneck  
Connecticut Fund for the Environment/Save the Sound  
Adelphi University

Friends of the Bay

Marine Sportfishing Education Foundation  
Milford Harbor Marina  
Audubon Connecticut  
Audubon New York  
Saybrook Point Marina  
Business Council of Fairfield County  
Coalition to Save Hempstead Harbor  
Pfizer Global Operations  
Westchester County Dept. of Planning  
J. B. E. Associates  
Regional Plan Association  
Nassau County Public Works Department  
Save the River / Save the Hills  
The Maritime Aquarium, Norwalk  
The Nature Conservancy  
PSEG Power Connecticut LLC.  
Town of Oyster Bay Dept. of Environmental Resources  
Federated Conservationists of Westchester County  
Advisory Commission on Coastal Waters, Town of Darien  
Coalition for the Protection of LI Groundwater  
Great Eastern Ecology, Inc.  
Ecology and Environment, Inc.  
Citizens Campaign for the Environment  
Daniel S. Natchez & Assoc., Inc., Revitalize Our Waterways  
Joel Rinebold LLC  
SoundWaters, Inc.  
Sound School Regional Vocational Aquaculture Ctr  
Hempstead Harbor Protection Committee  
Project Oceanology  
CT Marine Trades Association  
Manhasset Bay Protection Committee  
Town Hall, Town of North Hempstead

# THE CASE FOR PRESERVING PLUM ISLAND



PRESENTED BY THE  
PRESERVE PLUM ISLAND COALITION  
MARCH 2010

## Introduction

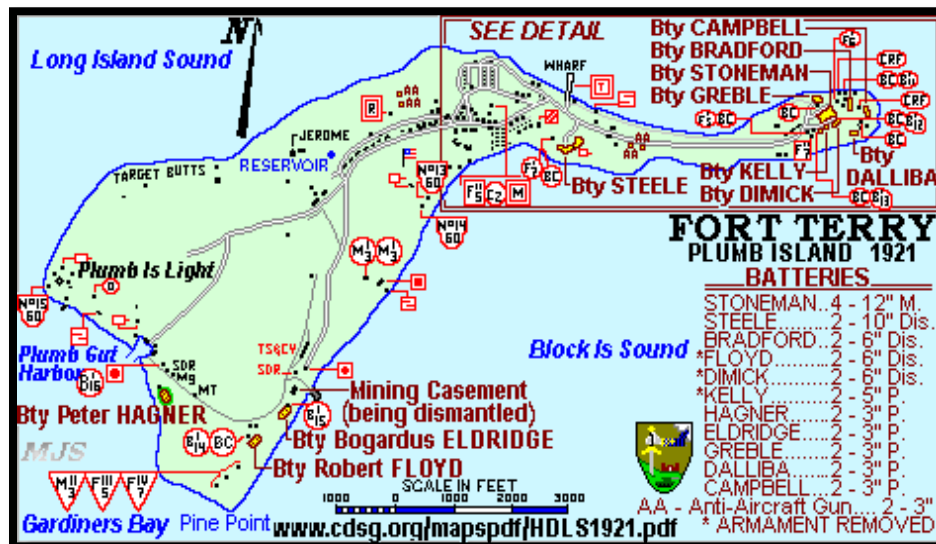
Located less than a mile from Orient Point, the tip of Long Island's North Fork, lies the 843 acre, pork chop-shaped Plum Island. Well-known from Nelson Demille's book of the same title and even more so because of the Plum Island Animal Disease Center ("PIADC") that exists there, a lesser known fact regarding the island is that about 90% of it is undeveloped and this vegetated portion has significant environmental, ecological, recreational, historic and scenic value.



*Plum Island Lighthouse*

## History

Plum Island, so named from the abundance of beach plum shrubs that cover it, has a long and colorful history. First "owned" by the Corchaug and Mantauk Indian tribes (LI Historical Journal article: the history of Plum Island, vol.16, Nos.1-2, pp. 176-181), the island was sold to Samuel Wyllys for a coat, a barrel of biscuits and 100 fishhooks. The federal government first claimed ownership on Plum Island in 1826 when it purchased 13 acres for the site where the Plum Island Lighthouse would be constructed. The lighthouse, also referred to as the Plum Gut Lighthouse, was constructed a year later. In 1897 the property owner sold another 150 acres of the island to the federal government for the construction of Fort Terry, a fortification first used in the Spanish-American War. The rest of the island was purchased by the federal government in 1901.



*Historical map of Fort Terry*

Fort Terry was decommissioned and declared surplus in 1948. By 1954, under the aegis of the US Department of Agriculture, PIADC became operational. In 1991 the federal government turned over operations of the facility to a private party.

## Environmental/Ecological Resources

Despite the more than half a century of active use by staff at the Center, Plum Island still contains significant natural resources and possesses remarkable scenic, environmental value and recreational potential. The island has a mixture of rocky shoreline, sand beaches, wetlands, and various upland shrub, grassland, and forest habitats. Several regionally rare plant species occur here, including Scotch loveage, slender knotweed, and sea-beach knotweed. A stand of blackjack oak represents the northernmost extent of the range of the species. Additionally, several rare species of orchids, such as Spring Ladies' Tresses (see Appendix I), and carnivorous plants are found here. In addition, the island is extensively vegetated by several dozen woody and herbaceous plants and this vegetation provides habitat that supports a wide variety of bird and insect species. The large freshwater wetland situated in the southeastern section of the island offers suitable habitat for dozens of wetland dependent plant and animal species. According to historical data this wetland once comprised one of the larger Atlantic White Cedar swamps (now a rather rare type of wetland community in the state) in coastal New York and there may be opportunities for community restoration. A maritime dune community found on the island is a New York State Natural Heritage Program ranked community (see Appendix I). A maritime dune community is dominated by grasses and low shrubs that occur on active and stabilized dunes along the Atlantic coast. This community consists of a mosaic of vegetation patches. This mosaic reflects past disturbances such as sand deposition, erosion, and dune migration. The composition and structure of the vegetation is variable depending on stability of the dunes, amounts of sand deposition and erosion, and distance from the ocean.



*Spring Ladies' Tresses*

*Photo: NRCS Plants Database, U.S. Department of Agriculture*



*Beach Plum*



Furthermore, based on detailed census work by Audubon staff over the past three years, over 80 bird species have been documented as breeding or foraging on Plum Island and adjacent coastal waters (see Appendix II and III). These include a variety of birds-of-prey, shorebirds, wading birds, waterfowl, and songbird species. In 2009, 7 active Osprey nests were noted and the island also hosts an active Bank Swallow colony, a species of bird on the decline in New York. Of special interest is the presence of Piping Plovers, a federally threatened species, which utilizes the shoreline habitat for breeding purposes. The Piping Plover shares this shoreline with several dozen Roseate Terns, a federally endangered species, and several hundred Common Terns, a NYS threatened species, which use the island as developmental habitat and for resting on its shoreline. The waters surrounding Plum Island are rich in nutrients and are vital feeding and courting grounds for birds such as these terns.



*Piping Plover chick*

As has been documented at other coastal islands and sites situated in southern New England, Plum Island undoubtedly provides critical stopover habitat for many fall migrant songbird species, many of which have not been fully documented in the census work discussed above because no detailed census work has taken place in late summer and autumn. Coastal islands are known to be vital for migrating land birds such as warblers, vireos, and thrushes, and many other birds that take advantage of the habitat to rest and feed (thereby refueling) before they continue their migration over water.

Moreover, the island and the waters surrounding it are important habitat for large congregations of numerous seabirds including several species of loons, grebes and marine waterfowl species such as American Black Duck, scaup species, Long-tailed Duck, all three scoter species, Bufflehead, Common Goldeneye, Common Eider and Red-breasted Merganser. Common Eiders, known to breed from nearby Fisher's Island may also breed on Plum Island; if so this would be only the second location in the state where this well-known sea duck breeds. Plum Island is part of the Orient Point to Plum Island Important Bird Area (see Appendix I) based upon the presence of species at risk, such as the previously mentioned Piping Plover and Common Terns along with Least Terns and for its water bird congregations.



*Surf Scoter*  
*Photo by Lloyd Spitalnik*



*Long-tailed Duck*



The island also hosted 8 active osprey nests in 2009 and Bank Swallows have been documented as nesting here. The wetlands in the southwestern portion of the island host Snapping and Painted Turtles and Common Dolphins have been sighted off the waters of the island. The offshore waters, especially of Plum Gut, host large concentrations of striped bass, bluefish, Tautog, summer flounder and others. Plum Gut is a major migration corridor for striped bass and Atlantic salmon.

Additionally, aerial seal censuses conducted by staff from the Riverhead Foundation for Marine Research and Preservation have found that the immediate offshore rocks and the waters surrounding the island are used extensively by several dozen to as many as three hundred Harbor and Grey Seals during the winter months (see Appendix IV). Over the past decade the number of seals hauling out here has increased. According to researchers from the Riverhead Foundation, “Plum Island is one of the haul out sites most frequented by seals and consistently has the largest number of seals observed during surveys”.



*Harbor Seals hauled out at Plum Island*

### **Cultural Resources**

As described in the overview on the history of the island, the island possesses significant cultural resources that merit protection. These notably include the Plum Island lighthouse and the remains of Fort Terry, a remnant from the Spanish-American War as well as World Wars I and II. A unique aspect of this fort was a “mini-gauge” railroad with a locomotive and cars used to move materials about to the various batteries and buildings. The fort actually consisted of nearly two dozen buildings and fortifications spread throughout the island, mostly in the central and eastern end of the island.



### **Proposed Sale of the Island**

Despite these significant natural, cultural, scenic and recreational values of Plum Island as described above, in 2008 Congress passed, and President Bush signed, PL 110-329, part of the Consolidated Security, Disaster Assistance and Continuing Appropriations Act. This legislation has set in motion the federal government's sale of the island to a private party. This law requires the Secretary of Homeland Security to sell Plum Island if he/she finds that the PIADC (referred to as the National Bio and Agro-defense Facility) "be located at a site other than Plum Island." Said finding has been made, a site in Kansas has been selected for the new facility, and the General Services Administration is readying Plum Island for sale. This law requires that all proceeds from the sale of the island be used to offset the costs of constructing the new facility as well as decommissioning the existing facility on Plum Island.

### **Proposal of the Preserve Plum Island Coalition**

In response to the proposed sale of Plum Island a number of conservation, environmental, and civic organizations have come together to form the "Preserve Plum Island Coalition" for the common purpose of protecting Plum Island (a list of Coalition members is included in Appendix V of the statement). **While coalition members are aware of the numerous options and strategies available to safeguard the island's resources (e.g.: a state park) the Coalition strongly endorses the idea that all or a significant majority of the island be protected as a National Wildlife Refuge, administered by the U.S. Fish and Wildlife Service.**

*Following are several additional reasons why Coalition members support the idea of establishing a Plum Island National Wildlife Refuge:*

#### **Consistency with Other Refuges**

Over the past three decades the federal government has established numerous National Wildlife Refuges in the eastern Peconic/southern New England region. These include, for example, Nomans National Wildlife Refuge, approximately three miles south of Martha's Vineyard; Block Island National Wildlife Refuge in the northern end of the island; Sachuest Point, John H. Chafee, Trustons Pond, and Ninigret National Wildlife Refuges in coastal Rhode Island, the 10 units of the Stuart B. McKinney National Wildlife Refuge stretching along the Connecticut coastline; and the Elizabeth Morton National Wildlife Refuge in Sag Harbor, NY. Many of these refuges are very similar to Plum Island in terms of their species and community composition and were once properties held by the federal government to fulfill other governmental purposes. In our judgment the natural resources and environmental values of Plum Island are every bit the equal of these other places which were affirmatively protected by an Act of Congress. Indeed, it is noteworthy that many of the Refuges were declared surplus by the federal government, but rather than being sold to the private sector, were instead transferred to the U.S. Fish and Wildlife Service to preserve the valuable natural resources contained therein.

#### **Role of Federal Government in Open Space Protection on Long Island**

The preservation of open space and establishment of public parkland has been the signature conservation achievement by various Long Island governments. Seven Suffolk towns have collectively spent nearly \$400 million to preserve open space while Suffolk County has committed at least that much, together preserving tens of thousands of acres. New York State has committed over \$100 million over the past two decades in acquiring key open space parcels. Despite this remarkable, indeed unprecedented, commitment by New York State and local governments on Long Island, the federal government's role in land protection has been unfortunately inconsequential. Preserving Plum Island by designating all or a significant majority as a National Wildlife Refuge would be a meaningful demonstration of the federal government's commitment to protecting key open spaces in the New York metropolitan area.

#### **Economic Benefits**

As several studies by the U.S. Fish and Wildlife Service have shown, refuges can be very popular sites for public visitation, thereby helping to underpin local economies, both by permitting certain extractive activities as well as promoting ecotourism. We believe that a "Plum Island National Wildlife Refuge" in which the public gains access to explore the island, orient themselves and learn about the island at a visitor center, visit the lighthouse and the remains of Fort Terry, enjoy the unparalleled scenic views and wildlife viewing opportunities, all the while hiking on the island's numerous trails would help achieve this desirable economic goal.

## Conclusion

The Preserve Plum Island Coalition is deeply concerned about the passage of the federal law that will result in the sale of Plum Island and the loss of the numerous values described above. We strongly believe the island should remain an asset of the federal government and be made available for appropriate public use and enjoyment by becoming a unit of the National Wildlife Refuge System, a course of action consistent with safeguarding the island's sensitive wildlife and ecological value

The Coalition calls on members of the New York State Congressional delegation to introduce legislation to reverse the proposed disposition and move to permanently protect all or a significant majority of the island by establishing the **Plum Island National Wildlife Refuge**, an action entirely consistent with past Congressional actions regarding other federal properties declared surplus and afforded permanent protection.



*Least Tern and chick  
Photo by Lloyd Spitalnik*

## Appendix I

### Descriptions and Classifications

**Important Bird Area:** The Important Bird Areas Program (IBA) is a global effort by the National Audubon Society to identify and conserve areas that are vital to birds and other biodiversity. IBA's are sites that provide essential habitat for one or more species of bird. IBAs include sites for breeding, wintering, and/or migrating birds.

**New York Natural Heritage Program and Global Ranking of Plum Island:** The New York Natural Heritage Program surveys and monitors rare animals, rare plants, and significant ecological communities throughout the state via a partnership between the NYS Department of Environmental Conservation (NYSDEC) and The Nature Conservancy. The mission of this program is to facilitate conservation of rare animals, rare plants, and natural ecosystems, which are commonly referred to as "natural communities." This mission is accomplished by working collaboratively with partners inside and outside New York to support stewardship of New York's rare plants, rare animals, and significant natural communities, and to reduce the threat of invasive species to native ecosystems.

G4 - apparently secure globally, though it may be quite rare in parts of its range, especially at the periphery  
S3-typically 21 to 100 occurrences, limited acreage, or miles of stream in New York State- status.

**Spring Ladies' Tresses (*Spiranthes Vernalis*):** This plant reaches the northern limit of its range in southeastern New York and southern New England. Extant populations in New York are limited to Suffolk County where only 5 of 17 historical populations have been re-located (Lamont 1996). While conducting a floristic inventory of Plum Island, just east of Orient Point in Suffolk Co., Eric Lamont and Richard Stalter observed more than 1000 flowering individuals of *S. vernalis* scattered throughout the island in August 2004. Small colonies occurred in several grassy openings but the vast majority of individuals were found in the former parade ground bordering the island's south shore; in 2004, the parade ground had not been mowed as frequently as in recent past years. The Plum Island population of *S. vernalis* was the largest in New York in 2004. Revisiting the island in 2005 revealed that the population size had dramatically decreased, even though the former parade ground had not been mowed before August. It is unclear what factors may have influenced the emergence of such high numbers of flowering individuals in 2004.

Excerpted from:

Lamont, Eric E. (The New York Botanical Garden) and Stephen M. Young (New York Natural Heritage Program)  
Journal of the Torrey Botanical Society (oldest botanical journal in N & S America)

2006, Volume 133, pages 655-656

*Spiranthes vernalis* Engelm. & A. Gray

Spring Ladies'-tresses

Orchidaceae, the Orchid Family



## Appendix II

### Species Data and Criteria Orient Point to Plum Island IBA

Common Name	Date	Seasonal/ Daily	Season	# Observed	Density (#/km2)	Units	Proposed Criteria	Confirmed Criteria
American Oystercatcher	2006	D	breeding	2		Breeding pairs		
	<b>Source Text:</b>	NYSDEC Long Island Piping Plover and Colonial Waterbird Surveys (these observations include the Orient Point and Plum Island survey areas)						
	2004	D	breeding	1		Breeding pairs		
	<b>Source Text:</b>	NYSDEC Long Island Piping Plover and Colonial Waterbird Surveys (these observations include the Orient Point and Plum Island survey areas)						
	2001	D	breeding	2		Breeding pairs		
	<b>Source Text:</b>	NYSDEC Long Island Piping Plover and Colonial Waterbird Surveys (these observations include the Orient Point and Plum Island survey areas)						
Piping Plover	2006	D	breeding	2		Breeding pairs		
	<b>Source Text:</b>	NYSDEC Long Island Piping Plover and Colonial Waterbird Surveys (these observations include the Orient Point and Plum Island survey areas)						
	2005	D	breeding	1		Breeding pairs		
	<b>Source Text:</b>	NYSDEC Long Island Piping Plover and Colonial Waterbird Surveys (this observation only includes the Orient Point survey area)						
	2004	D	breeding	4		Breeding pairs		
	<b>Source Text:</b>	NYSDEC Long Island Piping Plover and Colonial Waterbird Surveys (these observations include the Orient Point and Plum Island survey areas)						
	2003	D	breeding	3		Breeding pairs		
	<b>Source Text:</b>	NYSDEC Long Island Piping Plover and Colonial Waterbird Surveys (these observations include the Orient Point and Plum Island survey areas)						
	2002	D	breeding	2		Breeding pairs	A1 - Global Species of Conservation Concern	D1 - State Species of Conservation Concern
	<b>Source Text:</b>	NYSDEC Long Island Piping Plover and Colonial Waterbird Surveys (these observations include the Orient Point and Plum Island survey areas)						
	2001	D	breeding	3		Breeding pairs	A1 - Global Species of Conservation Concern	D1 - State Species of Conservation Concern
	<b>Source Text:</b>	NYSDEC Long Island Piping Plover and Colonial Waterbird Surveys (these observations include the Orient Point and Plum Island survey areas)						
	2000	D	breeding	2		Breeding pairs		
	<b>Source Text:</b>	NYSDEC Long Island Piping Plover and Colonial Waterbird Surveys (this observation included the Orient Point survey area only)						
	1998	D	breeding	7		Breeding pairs	A1 - Global Species of Conservation Concern	D1 - State Species of Conservation Concern
	<b>Source Text:</b>	NY Natural Heritage Biodiversity Databases						
	1997	D	breeding	6		Breeding pairs	A1 - Global Species of Conservation Concern	D1 - State Species of Conservation Concern

	<b>Source Text:</b>	NY Natural Heritage Biodiversity Databases						
	1996	D	breeding	9		Breeding pairs	A1 - Global Species of Conservation Concern	D1 - State Species of Conservation Concern
	<b>Source Text:</b>	NY Natural Heritage Biodiversity Databases						
	1995	D	breeding	5		Breeding pairs	A1 - Global Species of Conservation Concern	D1 - State Species of Conservation Concern
	<b>Source Text:</b>	NY Natural Heritage Biodiversity Databases						
	1994	D	breeding	8		Breeding pairs	A1 - Global Species of Conservation Concern	D1 - State Species of Conservation Concern
	<b>Source Text:</b>	NY Natural Heritage Biodiversity Databases						
	1993	D	breeding	5		Breeding pairs	A1 - Global Species of Conservation Concern	D1 - State Species of Conservation Concern
	<b>Source Text:</b>	NY Natural Heritage Biodiversity Databases						
Roseate Tern								
Common Tern	2004	D	breeding	40		Breeding pairs		D1 - State Species of Conservation Concern
	<b>Source Text:</b>	Mike Wasilco pers. comm. 2004; At least 40 nesting pairs						
Least Tern	2005	D	breeding	7		Breeding pairs		
	<b>Source Text:</b>	NYSDEC Long Island Piping Plover and Colonial Waterbird Surveys (includes the Orient Point survey area only)						
	2001	D	breeding	2		Breeding pairs		
	<b>Source Text:</b>	NYSDEC Long Island Piping Plover and Colonial Waterbird Surveys (observations from the Orient Point survey area only)						
	2000	D	breeding	11		Breeding pairs		
	<b>Source Text:</b>	NYSDEC Long Island Piping Plover and Colonial Waterbird Surveys (observations from the Orient Point survey area only)						
	1999	D	breeding	15		Breeding pairs		
	<b>Source Text:</b>	NYSDEC Long Island Piping Plover and Colonial Waterbird Surveys (observations from the Orient Point survey area only)						
	1998	D	breeding	27		Breeding pairs		D1 - State Species of Conservation Concern
	<b>Source Text:</b>	NY Natural Heritage Biodiversity Databases						
	1997	D	breeding	16		Breeding pairs		D1 - State Species of Conservation Concern
	<b>Source Text:</b>	NY Natural Heritage Biodiversity Databases						
	1996	D	breeding	108		Breeding pairs		D1 - State Species of Conservation Concern
	<b>Source Text:</b>	NY Natural Heritage Biodiversity Databases						

	1995	D	breeding	23		Breeding pairs		D1 - State Species of Conservation Concern
	<b>Source Text:</b>	NY Natural Heritage Biodiversity Databases						
	1994	D	breeding	16		Breeding pairs		D1 - State Species of Conservation Concern
	<b>Source Text:</b>	NY Natural Heritage Biodiversity Databases						
	1993	D	breeding	48		Breeding pairs		D1 - State Species of Conservation Concern
	<b>Source Text:</b>	NY Natural Heritage Biodiversity Databases						

### Appendix III Plum Island Bird Surveys

Species	1/25/07	3/5/07	6/27/07	7/13/07	11/27/07	6/19/08	7/5/08
American Black Duck	169	10			15		7
American Crow <sup>C</sup>	15	18	11	12	16	13	13
American Goldfinch <sup>P</sup>	1		7	7	3	8	13
American Kestrel	2	1	1				
American Oystercatcher <sup>C, P</sup>			13	9		5	8
American Redstart <sup>P</sup>			1	4		4	6
American Robin <sup>C, P</sup>	2	1	10	29	1	24	16
American Wigeon	12	45					
American Woodcock		1					
Bank Swallow <sup>C, P</sup>			76	129		126	266
Barn Swallow <sup>C</sup>			20	40		45	48
Black Scoter	3		1				
Black-capped Chickadee	4	2			5	7	7
Blue Jay	2		1	3	1	2	1
Brown Thrasher							2
Brown-headed Cowbird <sup>P</sup>			5	1	41	3	16
Canada Goose <sup>C</sup>	70	75	47	51	12	110	173
Carolina Wren	1	1	1	3	1	6	4
Cedar Waxwing <sup>C, P</sup>			20	15		28	30
Chipping Sparrow						1	1
Common Eider <sup>C, P</sup>			15	32	1	2	3
Common Goldeneye	12	26					
Common Grackle				2	152		
Common Loon	32	9			37		
Common Tern <sup>C</sup>			164	62		1162	113
Common Yellowthroat <sup>C</sup>			26	26		23	50
Coopers Hawk		1					
Dark-eyed Junco					1		
Double-crested Cormorant <sup>C</sup>			96	116	11	229	141
Downy Woodpecker	2		1	1			1
Eastern Kingbird <sup>P</sup>				4			1
Eastern Towhee <sup>C, P</sup>			20	22		24	30
European Starling <sup>C</sup>	40	30	9		66	10	5
Gadwall	2						
Gray Catbird <sup>C, P</sup>			13	31	1	30	58
Great Black-backed Gull <sup>P</sup>	1	15	10	14	40	27	29
Great Blue Heron							1
Great Cormorant	10	2			7		
Great Egret			2			4	13
Great-crested Flycatcher			1				
Greater Yellowlegs				14			1
Herring Gull <sup>C</sup>	79	99	6		69	5	12
Hooded Merganser		14					
Horned Grebe	2						
House Finch <sup>P</sup>		3		1		4	4
House Sparrow <sup>C</sup>				2		3	
House Wren <sup>C</sup>			6	9		9	18
Killdeer <sup>C, P</sup>		3		1		7	2



Species	1/25/07	3/5/07	6/27/07	7/13/07	11/27/07	6/19/08	7/5/08
Laughing Gull			1		1		
Long-tailed Duck						1	
Mallard	2	3			4		
Mourning Dove					4		
Mute Swan		2					
Northern Cardinal	2		2	4	5	5	10
Northern Flicker	1	2		1	1		2
Northern Gannet	250				12		
Northern Goshawk		1					
Northern Harrier	1	2		1	1	1	2
Northern Mockingbird	1		2	4		8	6
Northern Rough-winged Swallow			3	2		6	4
Osprey <sup>C, P</sup>			5	20		18	18
Peregrine Falcon					1		
Purple Sandpiper		25					
Razorbill	1						
Red-breasted Merganser	43	19		1	49		
Red-eyed Vireo							2
Red-shouldered Hawk		2					
Red-tailed Hawk	2	4	1	5	2	6	3
Red-throated Loon					8		
Red-winged Blackbird <sup>C, P</sup>		5	10	30		24	43
Ring-billed Gull	1						
Rock Pigeon				1			
Roseate Tern			20	17		26	13
Rough-legged Hawk	1						
Sharp-shinned Hawk	1	1					
Song Sparrow <sup>C</sup>	4	3	13	16	2	22	41
Spotted Sandpiper <sup>C</sup>				5			4
Surf Scoter	300	1	2		2		
Tree Swallow			1	20		5	8
Tufted Titmouse	1		1				1
Turkey Vulture <sup>P</sup>		2	2			2	
White-eyed Vireo <sup>P</sup>			4	9		8	10
White-throated Sparrow	12	5			10		
White-winged Scoter	36	4			3		
Willow Flycatcher			1				1
Yellow Warbler <sup>C, P</sup>			11	10		25	17
Yellow-rumped Warbler		6					
<b>TOTAL # Individuals</b>	<b>1120</b>	<b>443</b>	<b>662</b>	<b>786</b>	<b>585</b>	<b>2078</b>	<b>1278</b>
<b>TOTAL # Species</b>	<b>37</b>	<b>36</b>	<b>43</b>	<b>43</b>	<b>34</b>	<b>42</b>	<b>50</b>

<sup>C</sup> Confirmed Breeding							
<sup>P</sup> Probable Breeding							

23 confirmed breeding species

19 probable breeding species

8 probable species not in confirmed list

31 unique probable/confirmed species

**June 2009 Survey**

<b>Species</b>	<b>#</b>	<b>Breeding</b>
Canada Goose	129	confirmed
Double-crested Cormorant	184	confirmed
Great Egret	4	
Glossy Ibis	2	
Turkey Vulture	1	
Osprey	8	confirmed
Piping Plover	1	confirmed
American Oystercatcher	5	probable
Spotted Sandpiper	1	
Laughing Gull	4	confirmed
Herring Gull	8	
Great Black-backed Gull	16	
Roseate Tern	28	
Common Tern	554	confirmed
Mourning Dove	1	
Ruby-throated Hummingbird	1	
Northern Flicker	1	
Eastern Kingbird	2	probable
White-eyed Vireo	9	
Blue Jay	1	
American Crow	3	
Tree Swallow	1	
Northern Rough-winged Swallow	7	
Bank Swallow	111	confirmed
Barn Swallow	51	
Black-capped Chickadee	1	
Tufted Titmouse	1	
Carolina Wren	3	
House Wren	9	
American Robin	36	confirmed
Gray Catbird	35	confirmed
Northern Mockingbird	4	
Brown Thrasher	1	
European Starling	42	confirmed
Cedar Waxwing	23	
Yellow Warbler	16	probable
Prairie Warbler	1	
American Redstart	5	probable
Common Yellowthroat	30	
Eastern Towhee	30	
Song Sparrow	25	
Northern Cardinal	3	
Red-winged Blackbird	32	probable
Common Grackle	11	
Brown-headed Cowbird	3	probable
Orchard Oriole	2	probable
Baltimore Oriole	1	
House Finch	4	probable
American Goldfinch	5	
House Sparrow	2	probable

(Source: Audubon New York's Orient Point to Plum Island IBA conservation committee. Please note that the list of species is not comprehensive and only reflects the individuals detected during the surveys.)

# **Appendix IV** **Pinniped Flight Summary**

<b>Flight Date</b>	<b>GMT Time</b>	<b>Local Time</b>	<b>Site Name</b>	<b>Species</b>	<b>Total Estimated During Flight</b>
1/3/2007		15:32:52	Plum Island	P. vitulina	12
3/26/2007		10:52:46	Plum Island	P. vitulina	220
1/19/2008	18:29:41	13:29:41	Plum Island	P. vitulina	225
3/3/2008	16:49:06	11:49:06	Plum Island	P. vitulina	90
3/18/2008	16:20:00	11:20:00	Plum Island	P. vitulina	150
1/26/2009	20:55:01	15:55:01	Plum Island	P. vitulina	300
2/26/2009	20:53:11	15:53:11	Plum Island	P. vitulina	163
3/25/2009	19:00:06	14:00:06	Plum Island	P. vitulina	175
4/24/2009	19:51:32	14:51:32	Plum Island	P. vitulina	200
5/6/2009	18:11:58	13:11:58	Plum Island	n/a	0
6/7/2009	20:42:45	15:42:45	Plum Island	P. vitulina	15

\* Info taken from Pinniped Flight Summary 2001-2009  
P. vitulina – Harbor Seal

## **Appendix V Coalition Members**

### **American Littoral Society, Northeast Chapter**

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### **Blue Ocean Institute**

Carl Safina, President

### **Burke, Dr. Russell**

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### **Draud, Matthew**

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### **The Environmental Defense Fund**

### **Foundation for Ecological Research in the Northeast**

### **Green, Timothy M, Ph.D., CWB**

Chairman, Foundation for Ecological Research in the Northeast

### **Group for the East End**

### **Long Island Audubon Council**

(Eastern Long Island Audubon  
Great South Bay Audubon  
Huntington-Oyster Bay Audubon  
Four Harbors Audubon  
North Shore Audubon  
North Fork Audubon  
South Shore Audubon)

### **Long Island Paddlers**

### **Long Island Pine Barrens Society**

### **Long Island Soundkeeper**

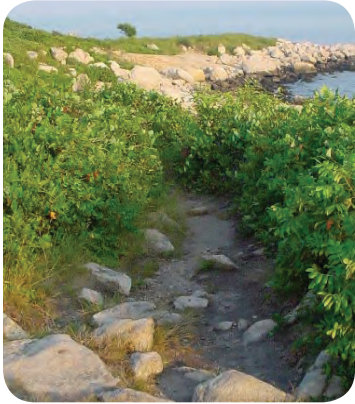
### **The Nature Conservancy**

### **North Shore Land Alliance**

### **Peconic Baykeeper**

### **Penny, Larry**

Director, East Hampton Town Natural Resources Department



# Long Island Sound **Stewardship Initiative**

2006 Stewardship Atlas



# Acknowledgements

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Printing for this document is provided by the Long Island Sound Study

A copy of this report can be downloaded at RPA's website [www.rpa.org](http://www.rpa.org)



# Introduction

In 2005, as a culmination of over 3 years of effort, the Long Island Sound Stewardship Initiative work group identified areas around the Sound with significant recreational and ecological values. The 2006 Stewardship Atlas provides maps of these 33 areas, which have been recommended as the inaugural stewardship areas, and describes the major ecological and recreational values of each area.

By identifying these important areas, the Stewardship Initiative aims to highlight the Sound's recreational and ecological resources, to raise awareness of the threats to these resources, and to facilitate on-the-ground stewardship actions. The Initiative promotes coordinated resource planning to develop a network of partners working in concert to address threats and respond to opportunities within each stewardship area.

As illustrated on the following pages, the boundaries of the stewardship areas are not strictly defined. Each area includes one or more "stewardship" sites, which are parcel-specific locations that represent the values or features for which that area is being highlighted. The overall stewardship area includes all sites that are physically or ecologically connected to the stewardship site(s) and where management action would prove beneficial to the stewardship area.

The majority of the recommended areas have stewardship sites that are under public ownership. These places, such as state parks and National Wildlife Refuges, were recognized for the unparalleled levels of public access or significant habitat acreage they provide. Private properties are included only with the permission of their owners, as the Stewardship Initiative is a completely voluntary program. The Stewardship Initiative partners hope that on-the-ground successes with the inaugural stewardship areas will serve as models to encourage participation by more private landowners.

At this time, the Stewardship Initiative focuses on the coastal and near-shore areas of Long Island Sound. However, there is legislation pending in Congress to formally create the Long Island Sound Stewardship Initiative. The current version of the Long Island Sound Stewardship Act, reintroduced in April 2006, limits stewardship activities to upland areas only. With the passage of the Stewardship Act, delineations of stewardship sites below the mean high water line may have to be redrawn.

# Long Island Sound Stewardship Initiative

**The Long Island Sound Study** works to protect and improve Long Island Sound. It is guided by Sound-wide planning efforts: the 1994 Comprehensive Conservation and Management Plan (CCMP) and the 2003 LIS Agreement, which builds upon the goals of the CCMP.

These planning efforts identified a number of high priority problems around the Sound:

1. Low dissolved oxygen (hypoxia)
2. Toxic contamination
3. Pathogen contamination
4. Floatable debris
5. Living resources & habitat management
6. Land use & development

**The Stewardship Initiative** is implementing two of the recommendations related to Living Resources & Habitat Management by identifying places with significant biological, scientific, or recreational value throughout Long Island Sound and developing a strategy to protect and enhance those special places.

The Stewardship Initiative has five specific goals:

- Preserve native plant and animal communities and unique habitat types.
- Improve recreation and public access opportunities.
- Protect threatened and endangered species in their natural habitats.
- Preserve sites that are important for long-term scientific research and education.
- Promote efforts to plan for multiple uses.

For more information on the Stewardship Initiative, go to [www.longislandsoundstudy.net/stewardship](http://www.longislandsoundstudy.net/stewardship)



Jennifer Cox

# Stewardship Initiative Timeline -

**2000** *Listen to the Sound* hearings

**2002** RPA digitizes the sites identified in the *Listen to the Sound* hearings

**2003- Ecological and coastal recreation inventory**

**2004**

RPA and the US Fish & Wildlife Coastal Program worked with resource experts in CT and NY to conduct a comprehensive analysis of the Sound's resources within its immediate coastal areas.

The inventory of important recreation and open space areas throughout Long Island Sound was led by the Regional Plan Association. The process of inventorying these sites involved combining input from resource managers and the public with available information regarding existing recreational facilities and parks.

The first step in the analysis was to meet with public and private natural resource managers and planners to identify criteria and landscape attributes that were important for open space and water-dependent recreation areas. Approximately 30 criteria and attributes were mapped in the following four categories: 1) public access to the water; 2) recreational and conservation need; 3) water resource protection; and 4) open space, cultural and recreational resources.

The inventory of important ecological areas was led by the US Fish & Wildlife Service Coastal Program, in cooperation with NY and CT resource experts. As a basis for the analysis, the following categories were developed to inventory the ecological and scientific resources throughout Long Island Sound:

**Exemplary Sites** – Areas that are representative of natural habitat types or ecosystems that are typical to Long Island Sound. These are areas that are not degraded. Included in this category are sites with high species productivity, concentration, or areas of high biological diversity.

**Outstanding Sites** – Areas that contain examples of unique or rare habitats or ecosystems. Included in this category are unditched tidal marshes or secondary dunes. Sites in this category may either be unique to the Sound or rare in a regional landscape context.

**Rare Species Habitat Sites** – Areas that serve as habitat for an assemblage of Federal or State listed threatened or endangered species or those areas that support an unusually high concentration of a single threatened or endangered species.

**Research/Educational Sites** – Areas that provide opportunities for research on and education about Long Island Sound.

**2005- Ecological and coastal recreation areas proposed for inclusion in the Long Island Sound**  
**2006 Stewardship Initiative**

With the aid of computerized mapping software (GIS), stewardship sites were chosen from the thousands of sites identified through the inventories and were organized into stewardship areas. Sites were selected based on the number of ecological or recreational categories that applied and, for recreation sites, the number of patrons served. Additional criteria used to identify the inaugural areas included representation of the Sound's diverse habitat types and recreational opportunities, the distribution of sites around the Sound, and community support for recognition of the area.









## Long Island Sound Stewardship Initiative Inaugural Stewardship Areas -



## Stewardship Areas in Connecticut - *from east to west*

Barn Island	10
Bluff Point	11
Great Neck - Goshen Point	12
Rocky Neck & Watts Island	13
Lower Connecticut River	14
Duck Island	15
Hammonasset Beach	16
Falkner Island	17
Quinnipiac River	18
West Rock Ridge	19
Sandy Point	20
Charles Island & Milford Point	21
Great Meadows	22
Sherwood Island	23
Norwalk River & Harbor	24





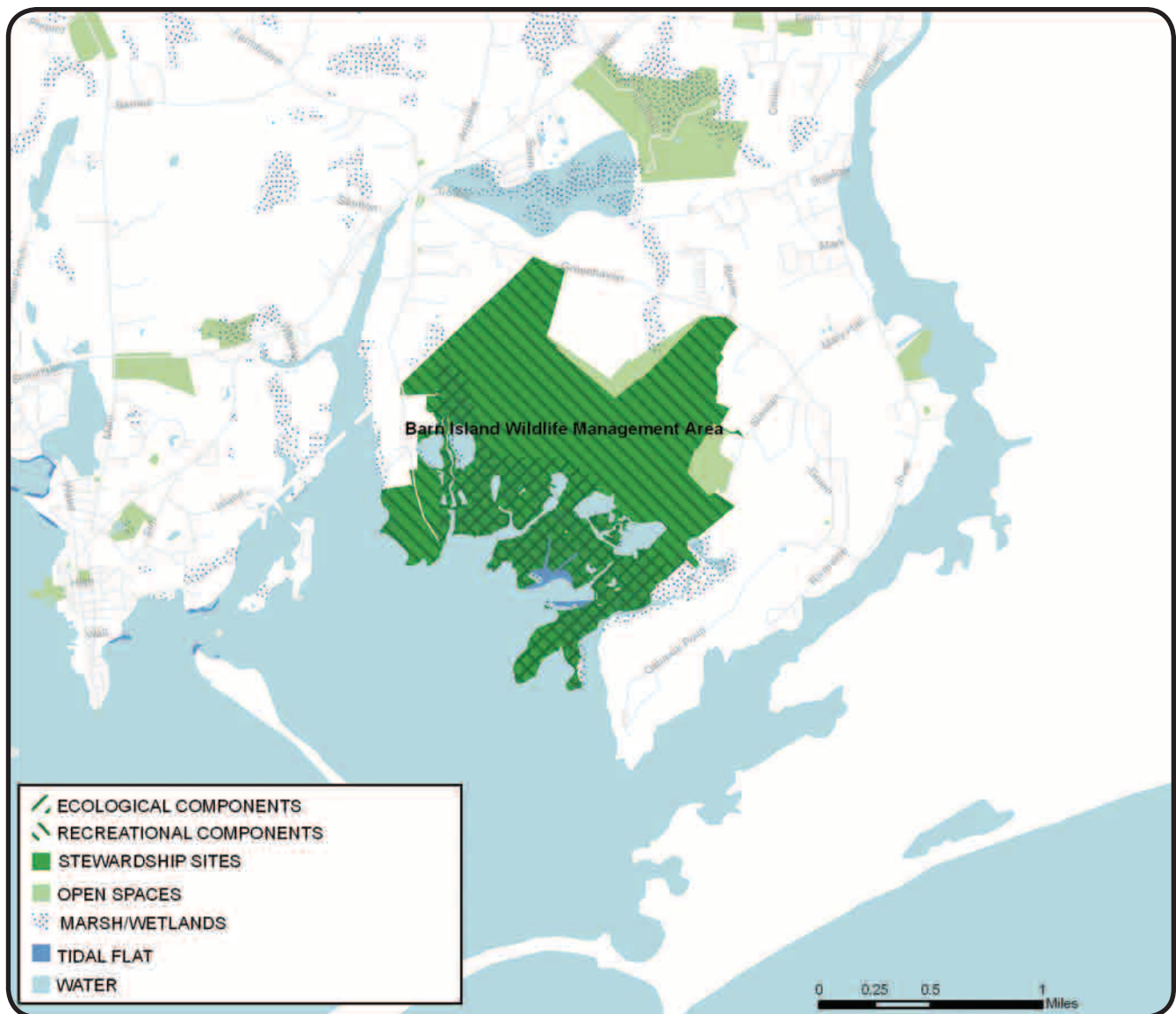
Jennifer Cox

# Stewardship Areas in New York

*Westchester County and from west to east*

- 25 Edith G. Read - Marshlands
- 26 Huckleberry - Davids Islands & Pelham Bay
- 27 Alley Pond
- 28 Manhasset Bay
- 29 Hempstead Harbor
- 30 Oyster Bay
- 31 Lloyd Neck
- 32 Crab Meadow
- 33 Nissequogue River
- 34 Stony Brook Harbor
- 35 Mt Sinai - Port Jefferson Harbor
- 36 Shoreham - Wading River
- 37 Jamesport - Mattituck Creek
- 38 Plum & Gull Islands
- 39 Fishers Island Coastline

## Barn Island Stonington, Connecticut -



### **Stewardship Site:** Barn Island Wildlife Management Area

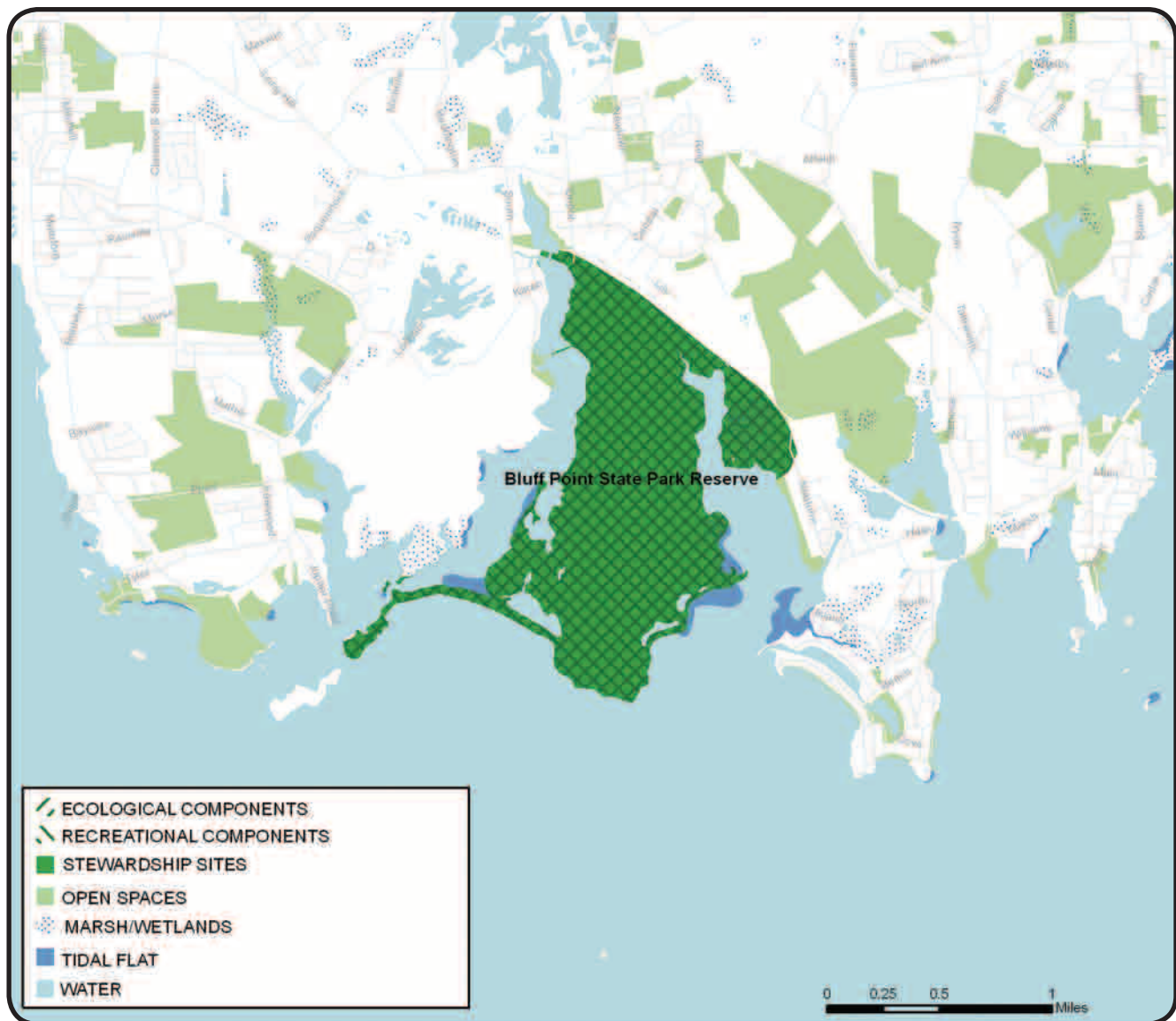
#### **Ecological significance:**

- Focus of over 50 years of continuous wetland research, including investigations into wetland degradation, and one of the few sites on the east coast to have pre-disturbance baseline mapping
- Contains five tidal wetland restoration sites that have been the subject of almost 25 years of pre- and post-restoration research and monitoring
- Exemplary salt and brackish marsh
- Includes rare fen habitat

#### **Recreational significance:**

- National Audubon designated “Globally Significant Important Birding Area” site
- New marsh education and viewing area and native plant demonstration area
- One of few extensive coastal trail systems in Connecticut (over 4.5 miles of trails)
- Regionally significant coastal education outdoor classroom
- Regionally significant waterfowl hunting area
- Highly popular state-of-the-art marine boating access facility

## Bluff Point Groton, Connecticut -



### **Stewardship Site:** Bluff Point State Park and Natural Area Preserve

#### **Ecological significance:**

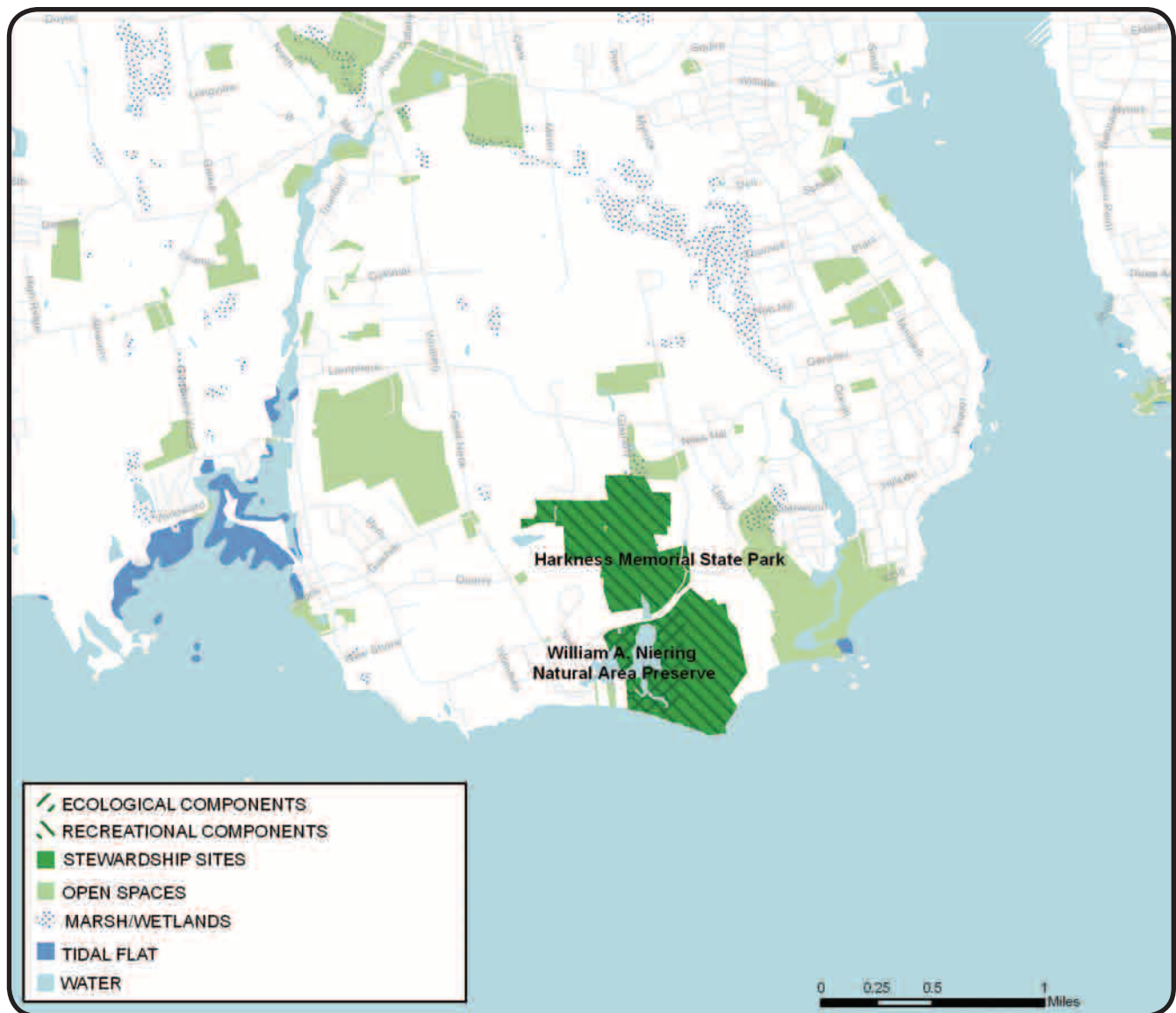
- Exemplary beach and dune habitat
- Rare back barrier sand flat habitat with rare plant communities and species
- Rare oligohaline wetland system
- Includes 'coastal old growth forest' and rare fen habitat

#### **Recreational significance:**

- Undeveloped barrier beach provides a unique "natural sandy beach experience"
- Car-top boat launch facility allows visitors to explore Poquonuck River salt marsh and popular coves along Fishers Island Sound
- Coastal bluff provides extraordinary views of southeastern Connecticut coastal landmarks (e.g. Ledge Light, Bushy Point barrier beach, and Pine Island)
- Recreational shellfish area
- Regionally significant coastal education outdoor classroom
- Nominated as a Connecticut Coastal Birding Trail Site



## Great Neck - Goshen Point Waterford, Connecticut -



**Stewardship Sites:** Harkness Memorial State Park and William A. Niering Natural Area Preserve

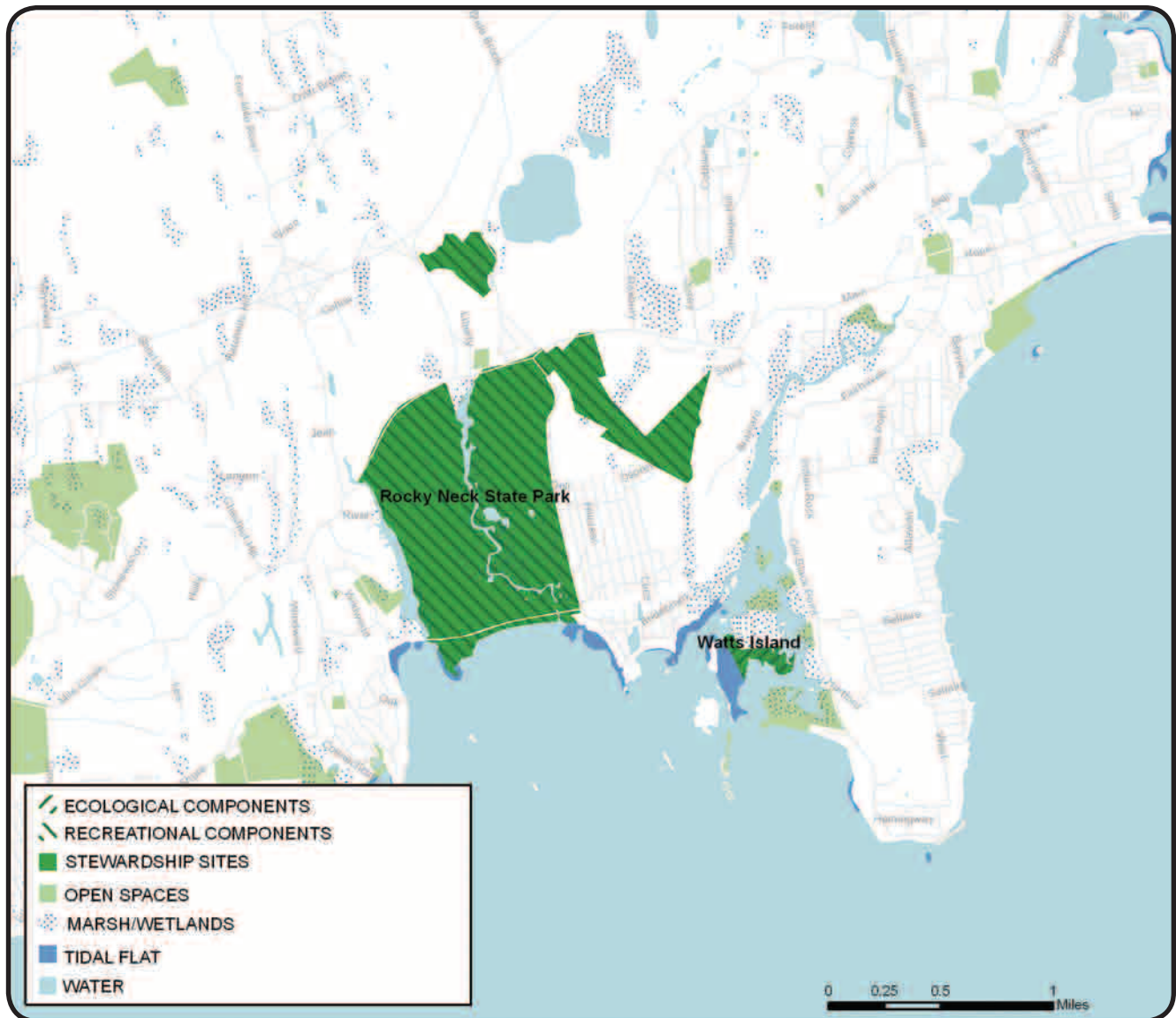
**Ecological significance:**

- Exemplary coastal barrier beach and primary dune communities
- Includes coastal grassland habitat

**Recreational significance:**

- Unusual and outstanding historical/cultural tourism attraction
- Provides a unique combination of coastal resource-based recreation and cultural tourism opportunities
- Fourth most visited park in state park system

# Rocky Neck & Watts Island East Lyme, Connecticut -



## **Stewardship Site:** Rocky Neck State Park

### **Recreational significance:**

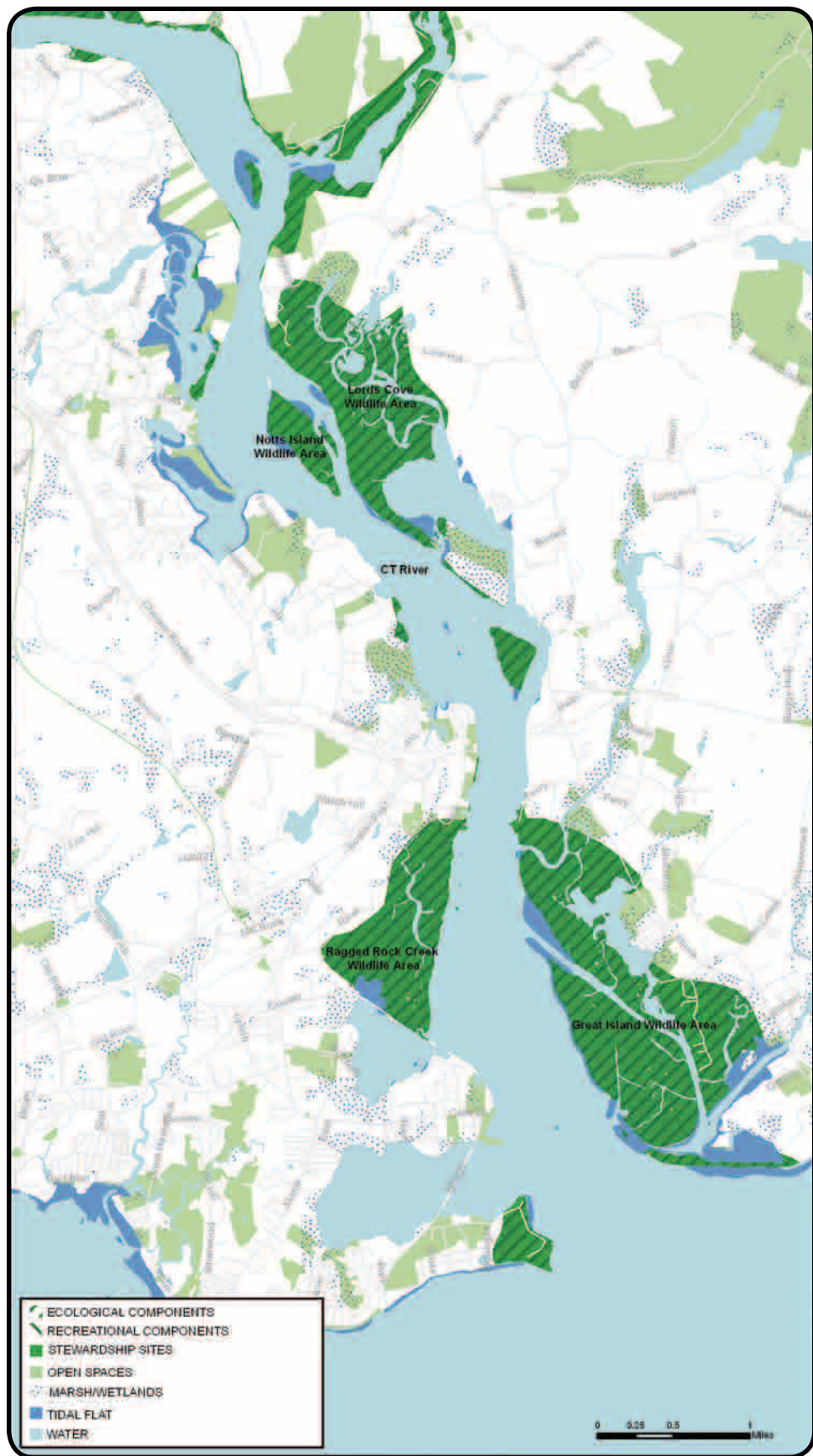
- Woodland-marsh trail system and coastal camping
- Coastal education nature center
- Highly popular swimming beach
- Historic and architecturally significant pavilion
- Rocky-shorefront popular with salt water anglers
- Diversity of recreation opportunities – unique on Long Island Sound
- Third most visited park in state park system

## **Stewardship Site:** Watts Island (owned by The Nature Conservancy)

### **Ecological significance:**

- Outstanding coastal barrier with the highest primary dune system in Connecticut
- Supports the best developed coastal maritime shrub thicket
- Site of tidal wetland research and sedimentation studies

# Lower Connecticut River Old Saybrook, Essex, Deep River, Lyme and Old Lyme, Connecticut



## Stewardship Site:

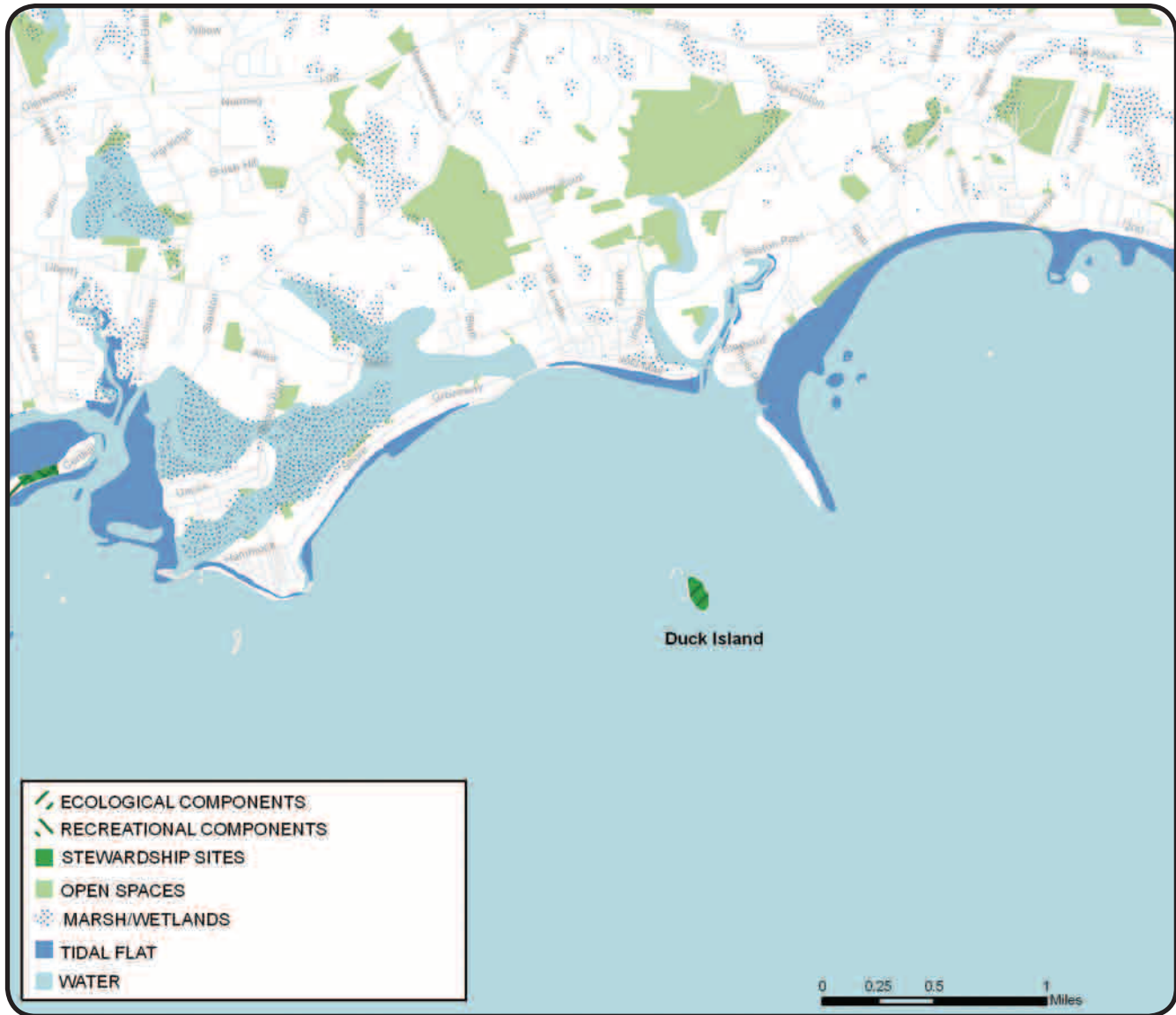
Connecticut River Ramsar Complex

## Ecological significance:

- Recognized as containing “Wetlands of International Importance” under the Ramsar convention
- Outstanding brackish – tidal fresh marsh complex



## Duck Island Westbrook, Connecticut -



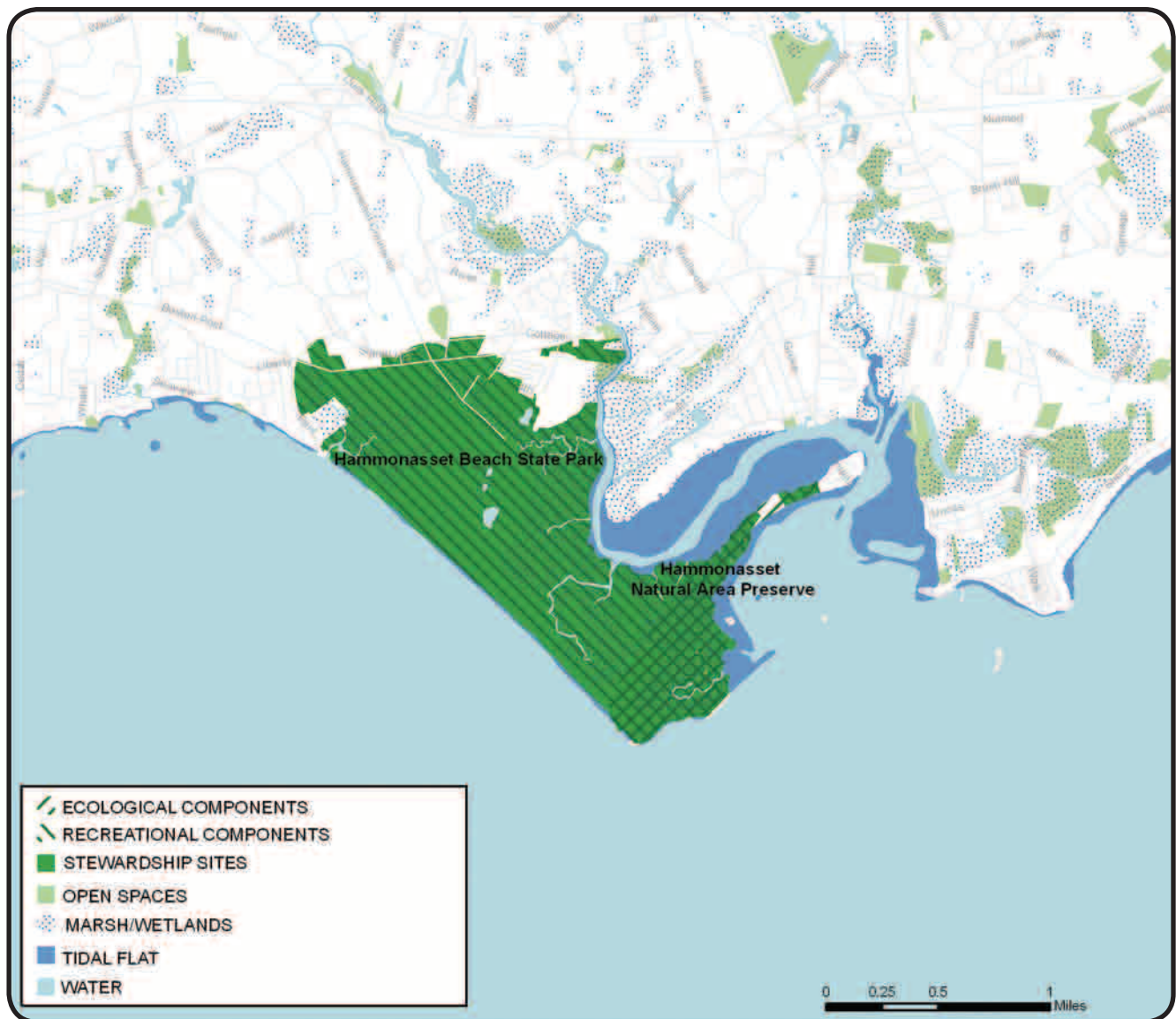
**Stewardship Site:** Duck Island Natural Area Preserve

**Ecological significance:**

- Provides nesting grounds for endangered roseate terns and other colonial water birds
- Exemplary island habitat



# Hammonasset Beach Madison, Connecticut -



## **Stewardship Sites:** Hammonasset Beach State Park and Natural Area Preserve

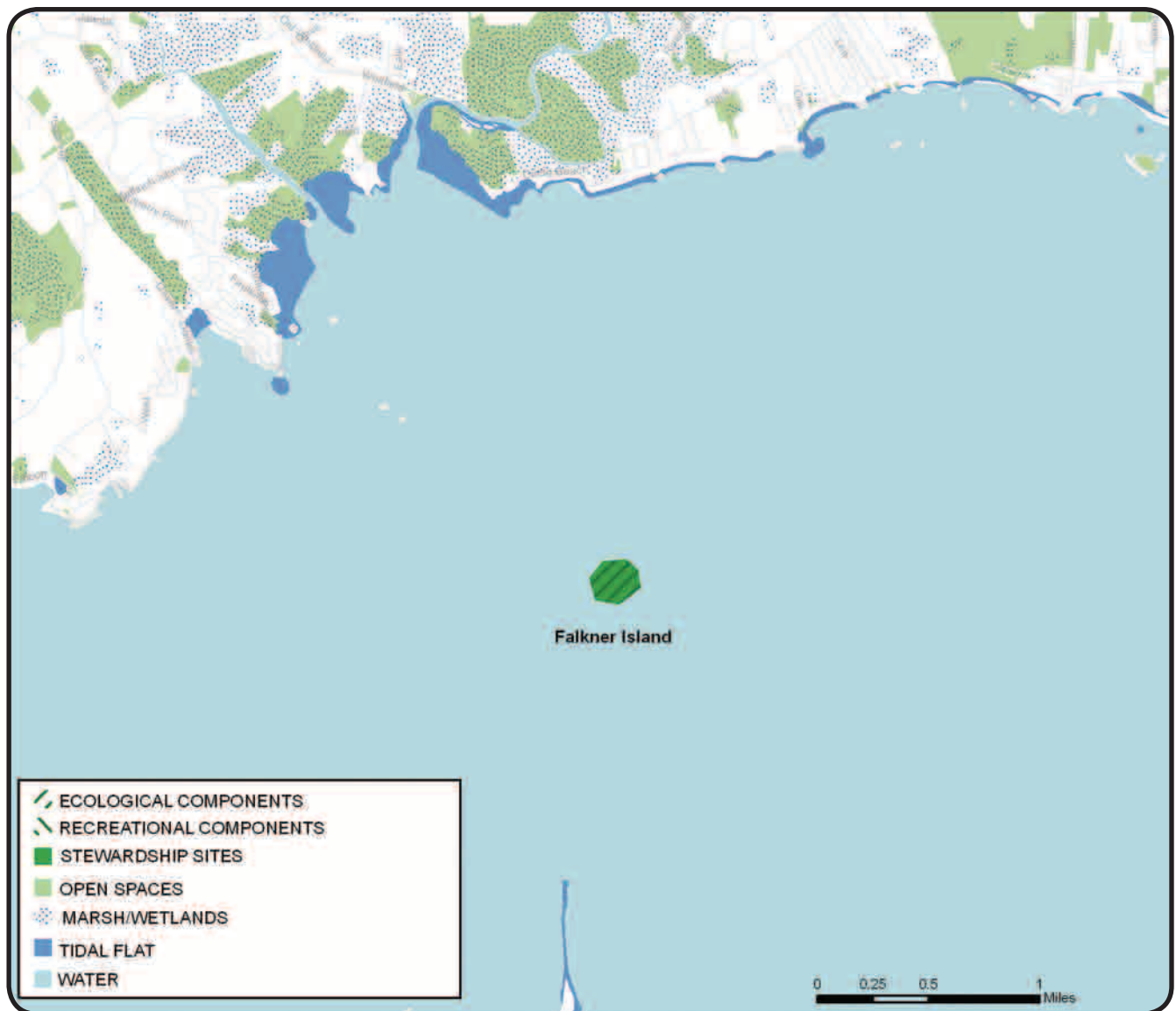
### **Ecological significance:**

- Extensive and exemplary salt marshes
- Exemplary coastal barrier habitat and plant communities
- Significant long-term research site

### **Recreational significance:**

- Provides outstanding coastal education services and interpretive programs
- National Audubon designated “Globally Significant Important Birding Area” site
- Extensive coastal trail system and opportunities for coastal camping
- Most visited park in state park system

## Falkner Island Guilford, Connecticut -

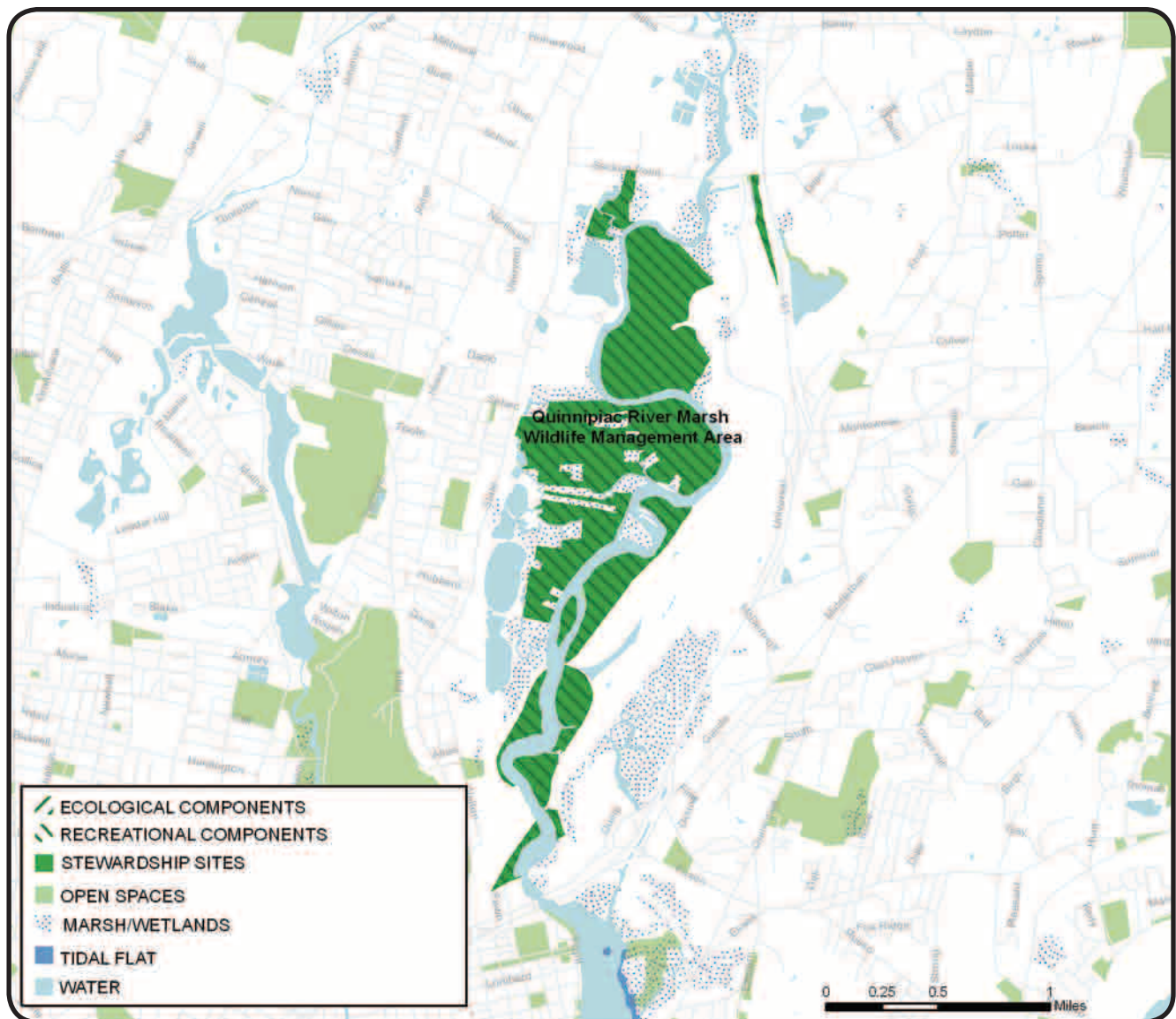


**Stewardship Site:** Falkner Island Unit of the Stewart B. McKinney National Wildlife Refuge

**Ecological significance:**

- Provides nesting grounds for endangered roseate terns and other colonial water birds
- Exemplary island habitat

## Quinnipiac River New Haven, Connecticut -



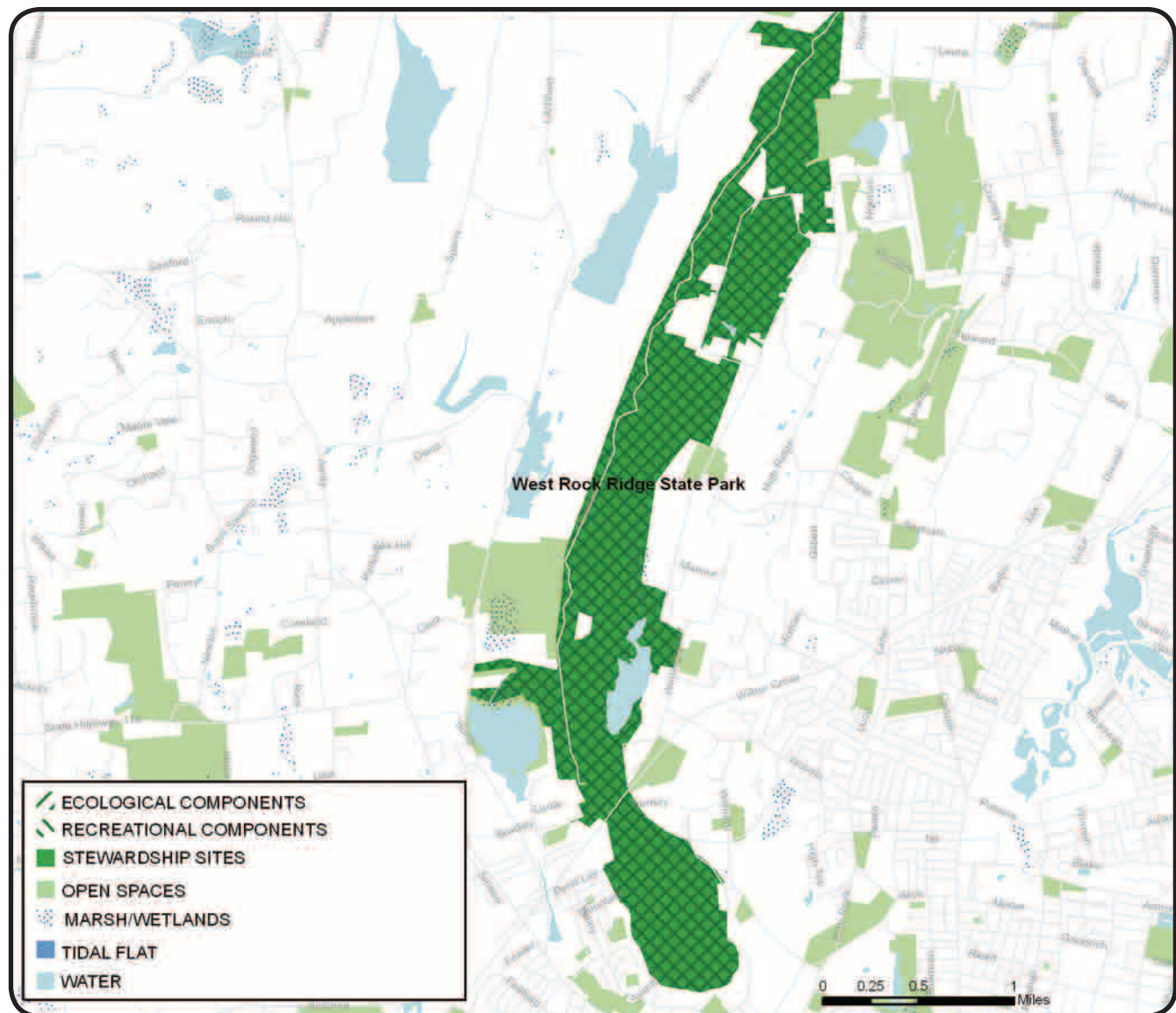
**Stewardship Site:** Quinnipiac River Marsh Wildlife Management Area and State Park

**Recreational significance:**

- National Audubon designated “Important Birding Area” site
- Important waterfowl hunting area



## West Rock Ridge Hamden and New Haven, Connecticut -



### **Stewardship Site:** West Rock Ridge State Park

#### **Ecological significance:**

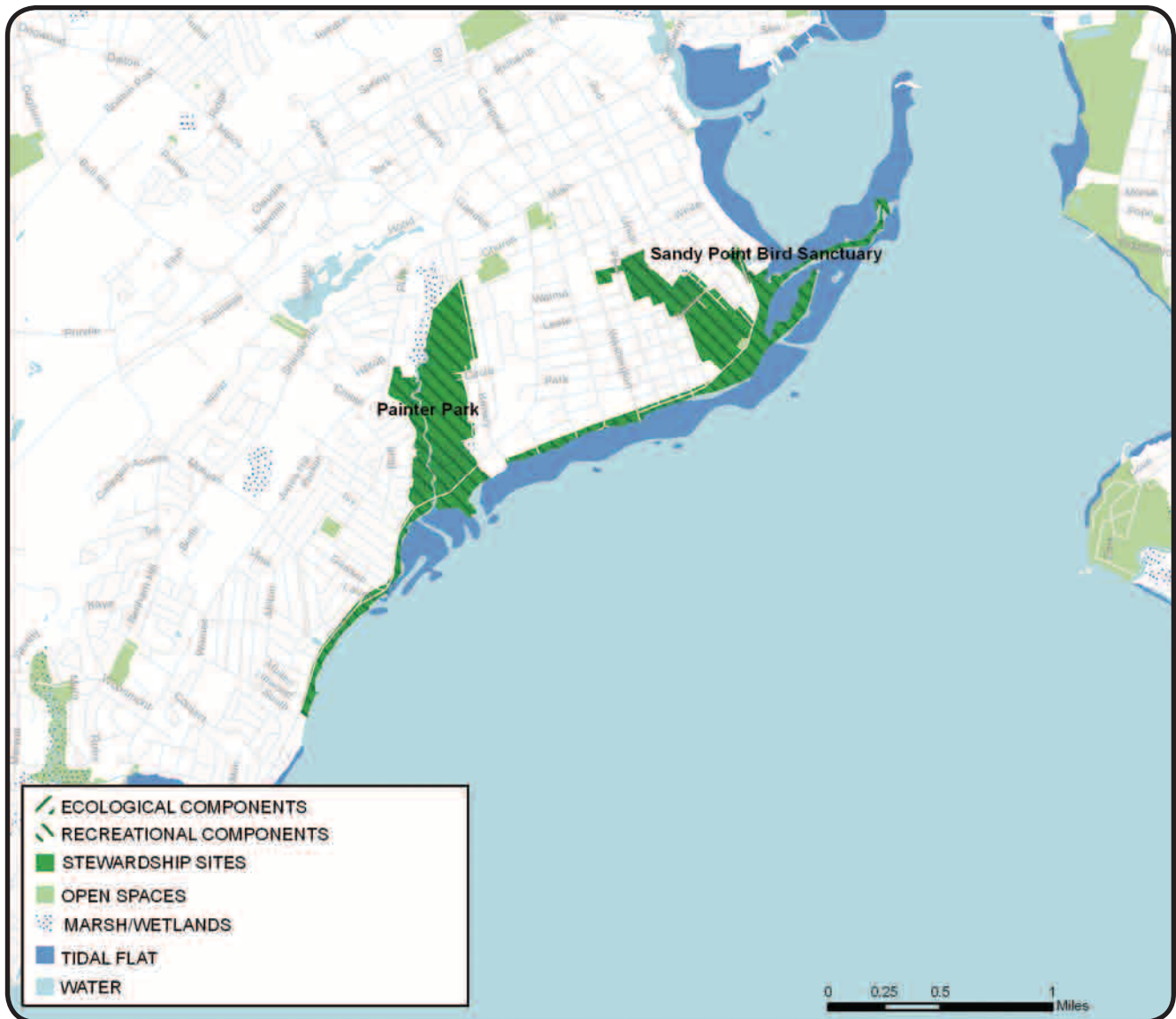
- Outstanding traprock ridge segment
- Provides habitat for numerous rare plants and insects
- Rare landform type in the Long Island Sound ecosystem

#### **Recreational significance:**

- Site of extraordinary geological history interest
- Includes a nature center
- Provides boating access to the West River
- Extensive trail system



## Sandy Point West Haven, Connecticut -

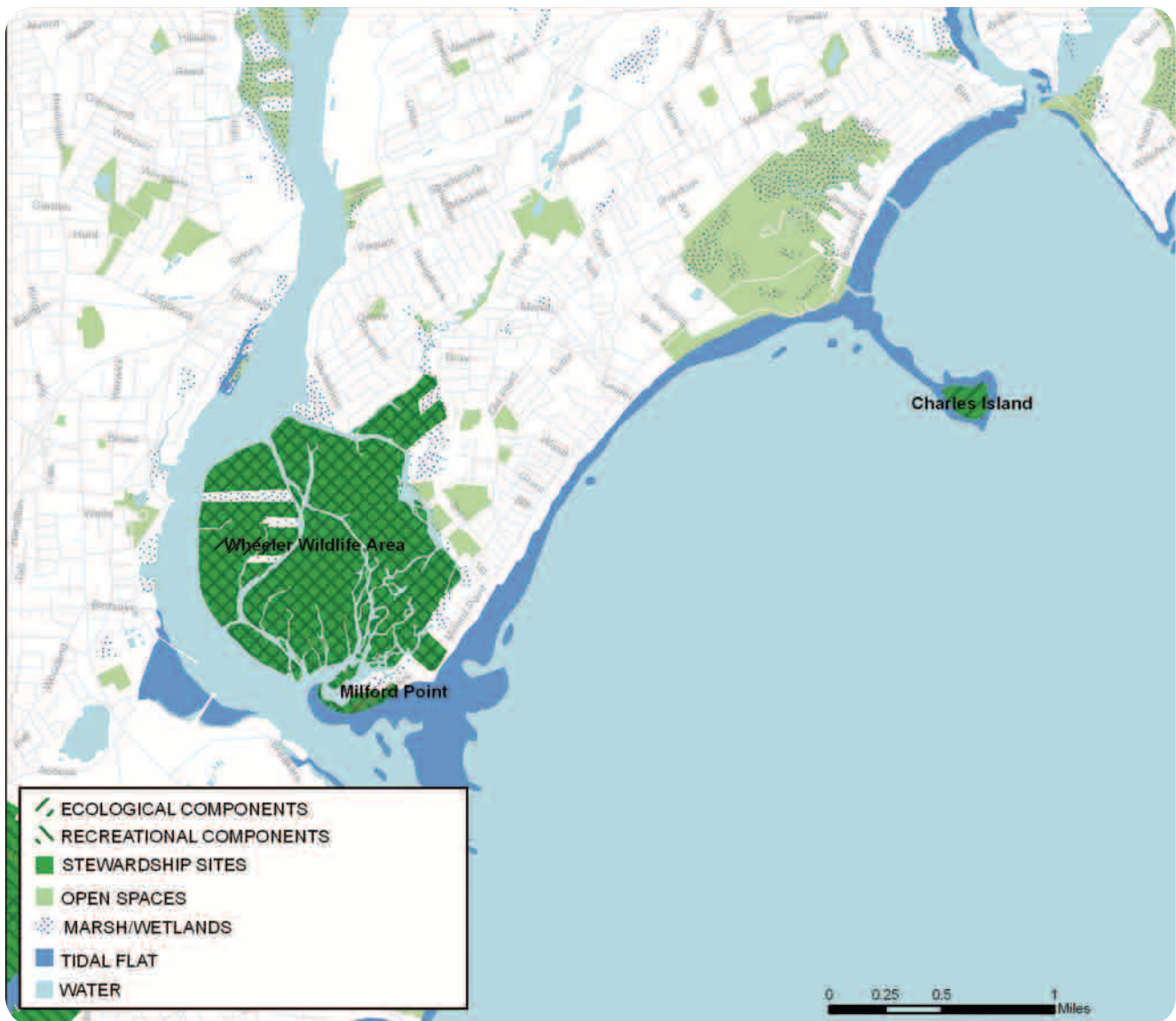


### **Stewardship Sites:** Sandy Point Bird Sanctuary and Painter Park

#### **Recreational significance:**

- 3.5 miles of beach from Bradley Point Park to Sandy Point
- Connected by a 1.7-mile urban waterfront greenway for pedestrians, bikes, and rollerbladers
- Supports a variety of fishing, swimming and boating opportunities in an urban setting
- Provides scenic views of the lighthouse located in New Haven Harbor
- Wildlife viewing from Sandy Point and the Bird Sanctuary

# Charles Island & Milford Point Milford, Connecticut -



**Stewardship Site:** Charles Island Natural Area (part of the Stewart B. McKinney National Wildlife Refuge)

**Ecological significance:**

- Provides nesting grounds for endangered roseate terns and other colonial water birds
- Exemplary island habitat

**Stewardship Sites:** Milford Point (part of the Stewart B. McKinney National Wildlife Refuge) and Wheeler Wildlife Management Area

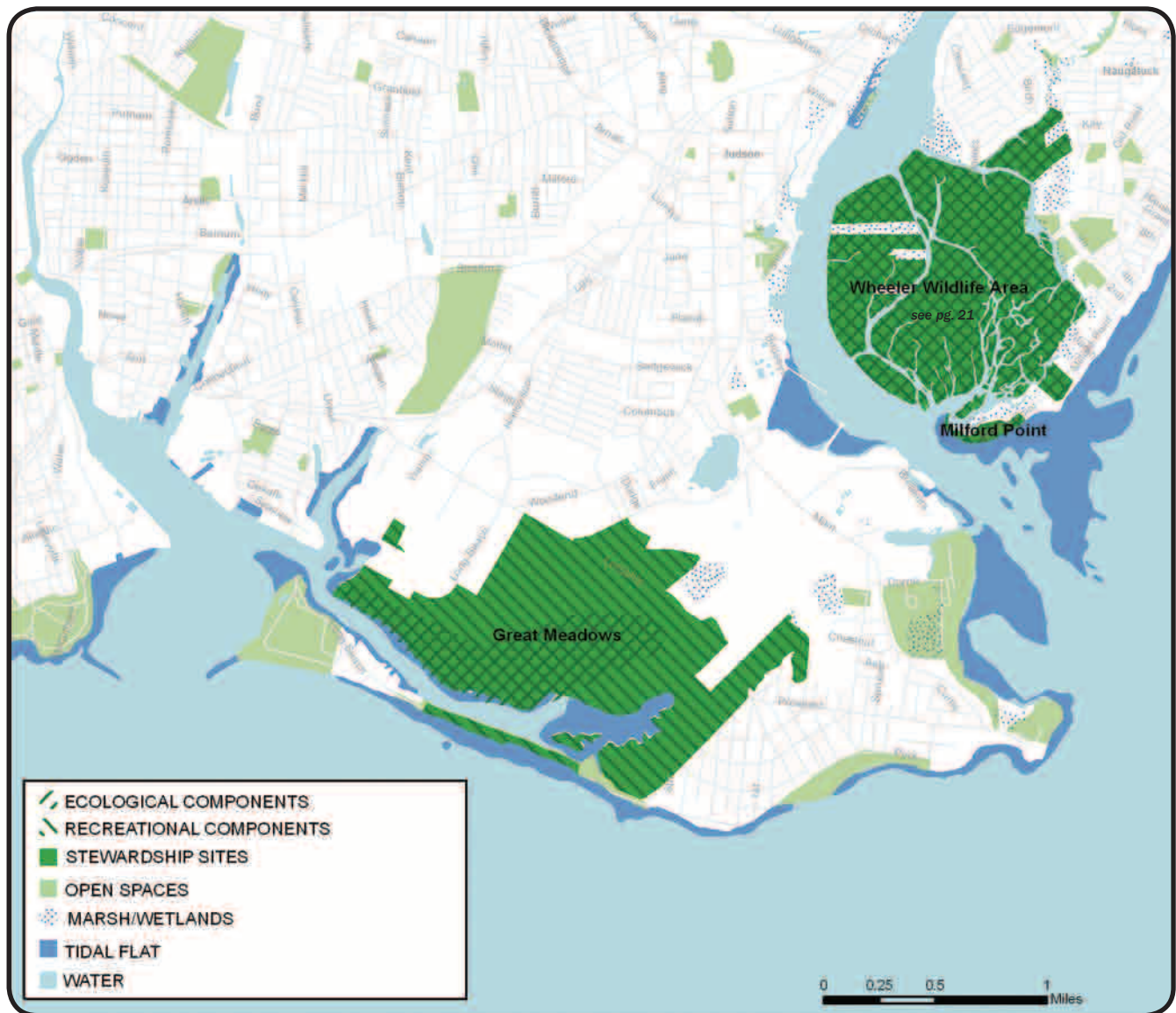
**Ecological significance:**

- Outstanding back barrier sand flats with rare plant communities and species
- Exemplary primary dune habitat
- Largest unditched brackish marsh complex dominated by low marsh in Long Island Sound
- Includes intertidal shoals that, in combination with the brackish marshes, are a significant wildlife concentration area and provide habitat and foraging areas for colonial water birds

**Recreational significance:**

- Outstanding coastal outdoor education facility
- Regionally significant waterfowl hunting area

## Great Meadows Stratford, Connecticut -



**Stewardship Site:** Great Meadows Unit of the Stewart B. McKinney National Wildlife Refuge

**Ecological significance:**

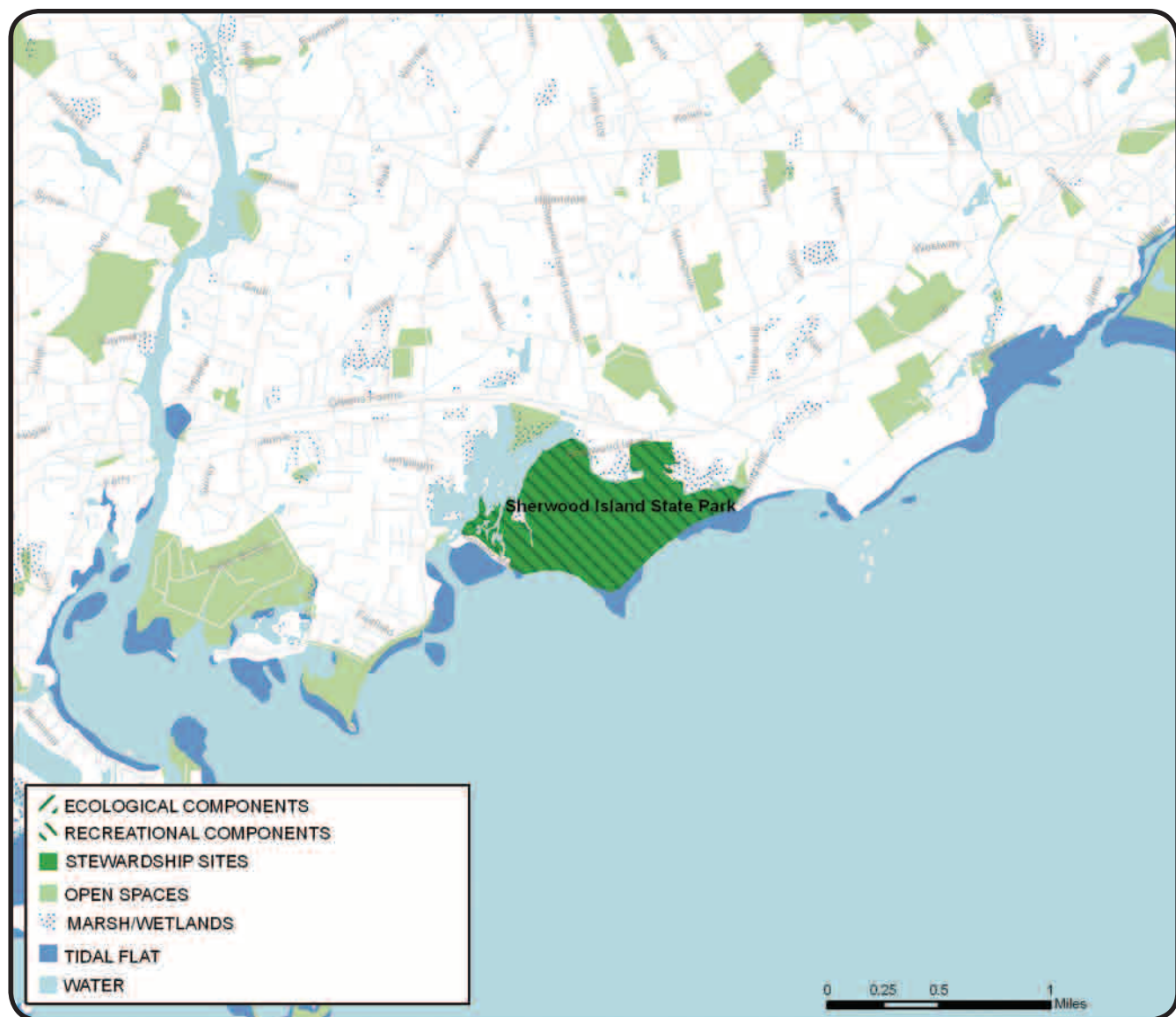
- Critical colonial water bird habitat
- Largest complex of unditched high marsh in Connecticut
- Provides habitat for rare plant and animal species

**Recreational significance:**

- Provides swimming, fishing and boating opportunities
- Onshore access for wildlife viewing



## Sherwood Island Westport, Connecticut -



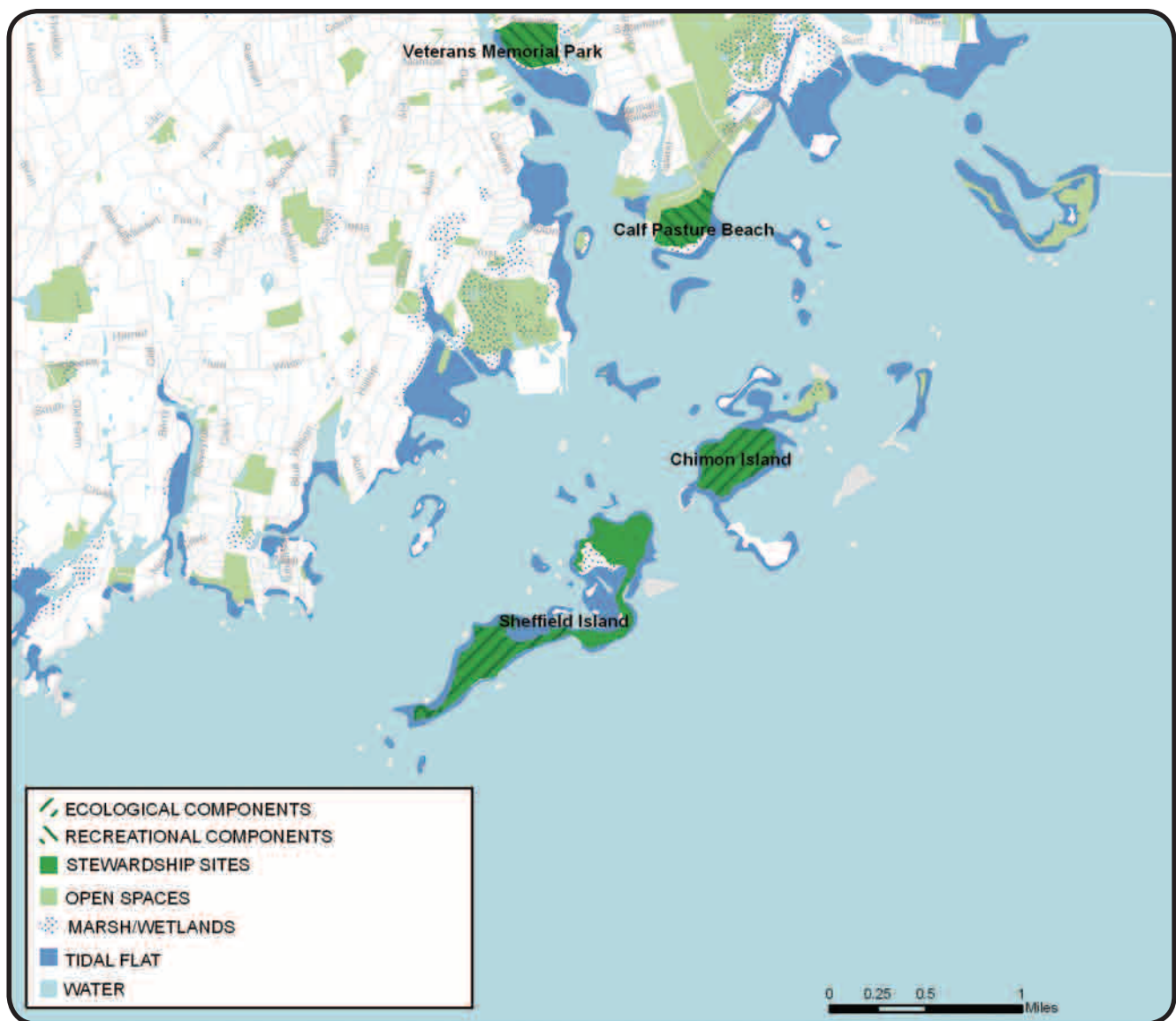
### **Stewardship Site:** Sherwood Island State Park

#### **Recreational significance:**

- Significant saltwater swimming beach serving New York/Bridgeport metropolitan areas
- Nature trails
- September 11th Living Memorial
- State-of-the-art natural resource experiential learning facilities opened in 2005
- Approximately 500,000 visitors each year, making it the second most visited state park



## Norwalk River & Harbor Norwalk, Connecticut -



**Stewardship Sites:** Chimon and Sheffield Islands (part of the Stewart B. McKinney National Wildlife Refuge)

**Ecological significance:**

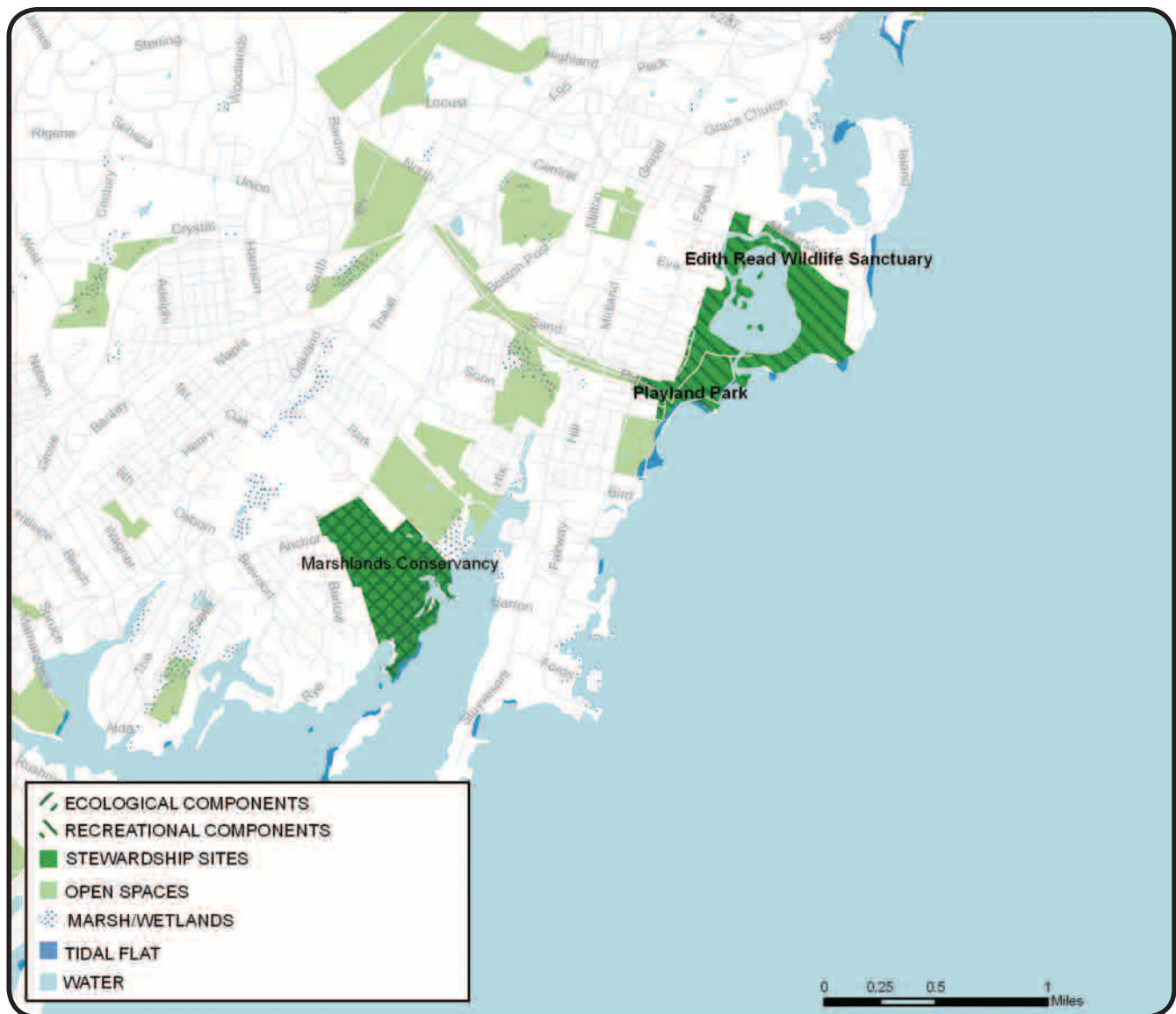
- Critical colonial water bird habitat
- Exemplary island habitat

**Stewardship Sites:** Calf Pasture Beach and Veterans Memorial Park

**Recreational Significance:**

- Key urban waterfront access points where recreational need is high for city population
- Access opportunities provided by privately owned waterfront walkways
- Includes public boat slips and moorings, boat launches for both small and trailered boats, and fishing access areas

## Edith G. Read - Marshlands Rye and Harrison, New York -



**Stewardship Sites:** Marshlands Conservancy, Edith G. Read, and Rye Playland Park

### Ecological significance:

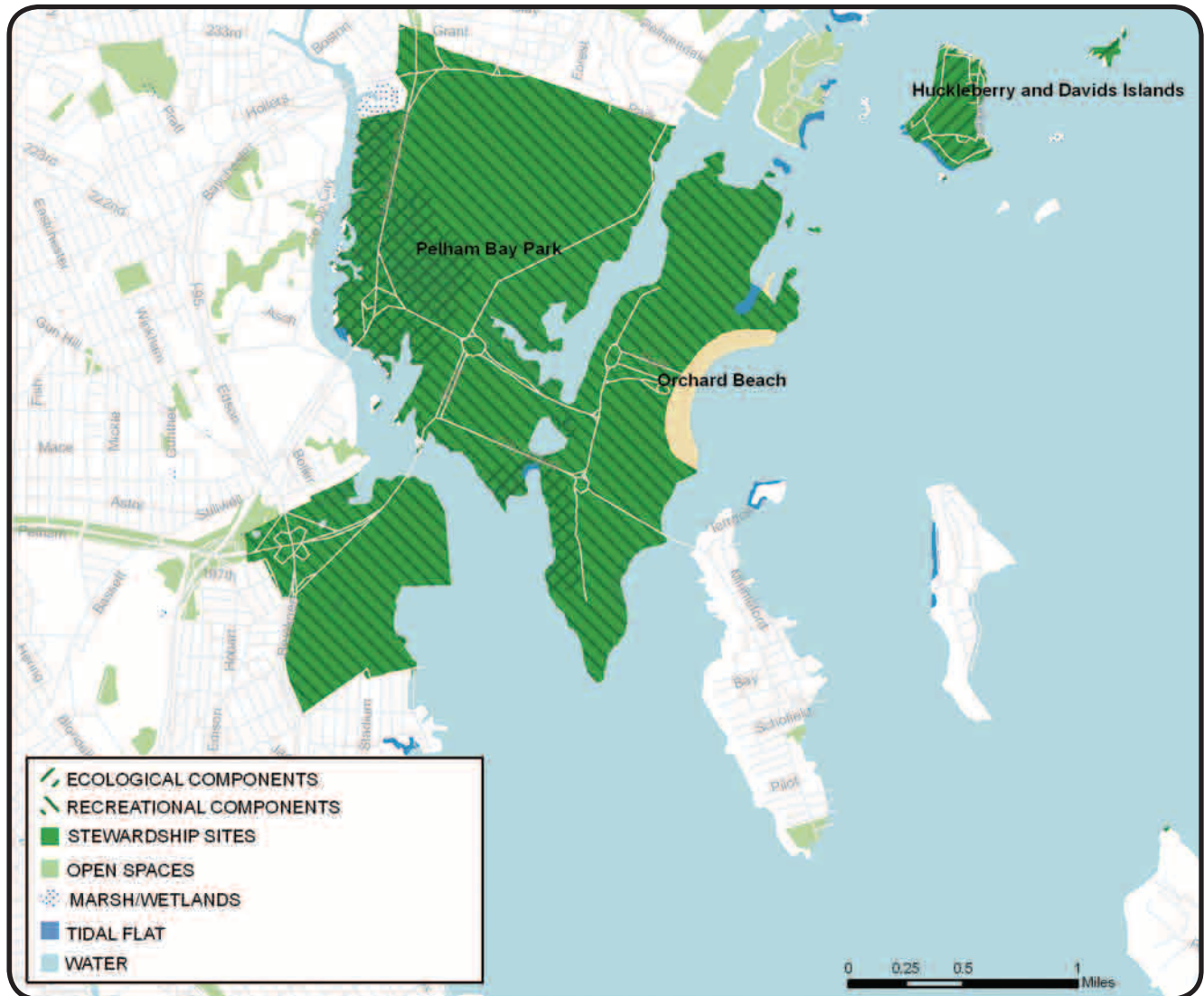
- One of the largest contiguous areas of undeveloped coastal land and the largest tidal marsh system in Westchester County
- Provides nesting and feeding habitat for native shorebirds and rare birds, including the wood sandpiper, black rail, little gull, sedge wren and yellow-headed blackbird
- Part of the Westchester County Parks System

### Recreational significance:

- Provides dockside accommodations for both power and sail boats
- Includes the only general admission swimming beach on Long Island Sound in Westchester County
- Excellent opportunities for fishing and bird watching
- Environmental education programs provide opportunities for informal nature study

# Huckleberry - Davids Islands & Pelham Bay

## Bronx and New Rochelle, New York



**Stewardship Sites:** Pelham Bay Park, Orchard Beach, Huckleberry Island and Davids Island

### Ecological significance:

- Almost 500 acres of relatively undisturbed tidal wetlands – one of the few remaining in the Bronx
- Provides productive nursery and feeding habitats for a variety of marine finfish and shellfish, including striped bass, bluefish, silversides, menhaden, winter flounder, clams, oyster, and horse-shoe crabs
- Largest colonial waterbird rookery in western Long Island Sound
- Includes areas designated as New York State Significant Coastal Fish and Wildlife Habitat

### Recreational significance:

- Largest municipal park in New York City
- Provides opportunities for unparalleled fishing, birdwatching, boating access, informal nature study, and SCUBA
- Environmental Center attracts students and visitors throughout northern New York City for educational nature study
- Includes the premier swimming beach in the Bronx
- Historically, an important commercial lobstering area
- Opportunity for potential park on Davids Island following the cleanup of toxic materials



# Alley Pond Queens and Hempstead, New York -



## **Stewardship Sites:** Alley Pond Park and Fort Totten

### **Recreational significance:**

- Environmental Center serves over 20,000 visitors annual and offers programs in ecology and life sciences for students of all ages.
- Very important spring striped bass recreational fishery
- Boating and fishing opportunities
- Provides opportunities to experience over 635 acres of forested hills, ponds, meadows, salt marshes, tidal flats and freshwater wetland habitats that are unusual in the northern Queens County and East River area
- Important winter waterfowl area provides opportunities for observation



This map illustrates the geographical context of the Manhasset Bay and Mitchells Creek area. The water bodies are shown in light blue. The surrounding land is divided into various colored zones representing different ecological and recreational components. A legend in the bottom left corner defines these components: Ecological Components (green diagonal lines), Recreational Components (green diagonal lines), Stewardship Sites (solid green), Open Spaces (light green), Marsh/Wetlands (blue dots), Tidal Flat (dark blue), and Water (light blue). The map also shows numerous streets and neighborhoods, including Manhasset, Mitchells Creek, and surrounding areas like North Hempstead and Longbridge. A scale bar at the bottom right indicates distances in miles (0, 0.25, 0.5, 1).

### Ecological significance:

- Recreational significance:**

- Pending passage of the federal Long Island Sound Stewardship Act, delineations of stewardship sites below mean high water may need to be redrawn.***

# Hempstead Harbor North Hempstead, New York -

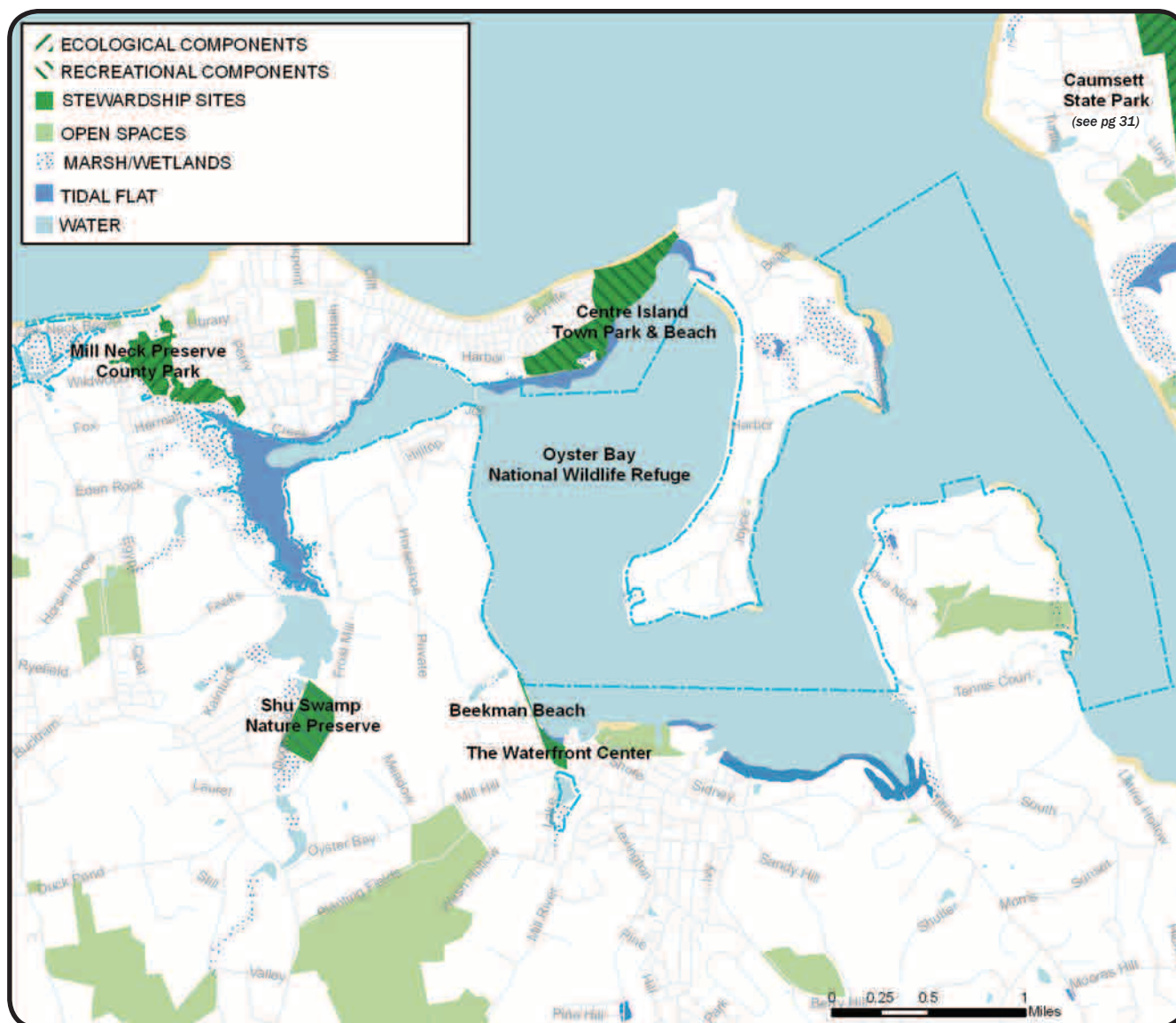


**Stewardship Sites:** Hempstead Harbor, Morgan Park, Tappen Beach, and Sands Point Preserve

**Recreational significance:**

- The numerous preserves surrounding the Harbor offer public access to natural areas and educational opportunities
- Access to public beaches, walkways and a marina
- Additional trails and a boat launching area planned for the southern end of the Harbor
- Designated by Audubon New York as an Important Bird Area
- Observation of at least 10 Osprey nests

# Oyster Bay Oyster Bay, New York -



**Stewardship Sites:** Oyster Bay National Wildlife Refuge, Mill Neck Preserve, Centre Island, Beekman Beach, the Waterfront Center, and Shu Swamp Nature Preserve

## Ecological significance:

- Designated as New York State Significant Coastal Fish and Wildlife Habitats
- Provides important habitat for diamondback terrapin and wintering bald eagles
- Supports the only known spawning population of native brook trout in Nassau County
- Includes red maple - black gum swamp habitat
- Provides habitat for American strawberry bush and sweetbay magnolia, both state endangered plants
- Restored riverine migratory corridor for upstream passage of alewives, herring, and sea run trout

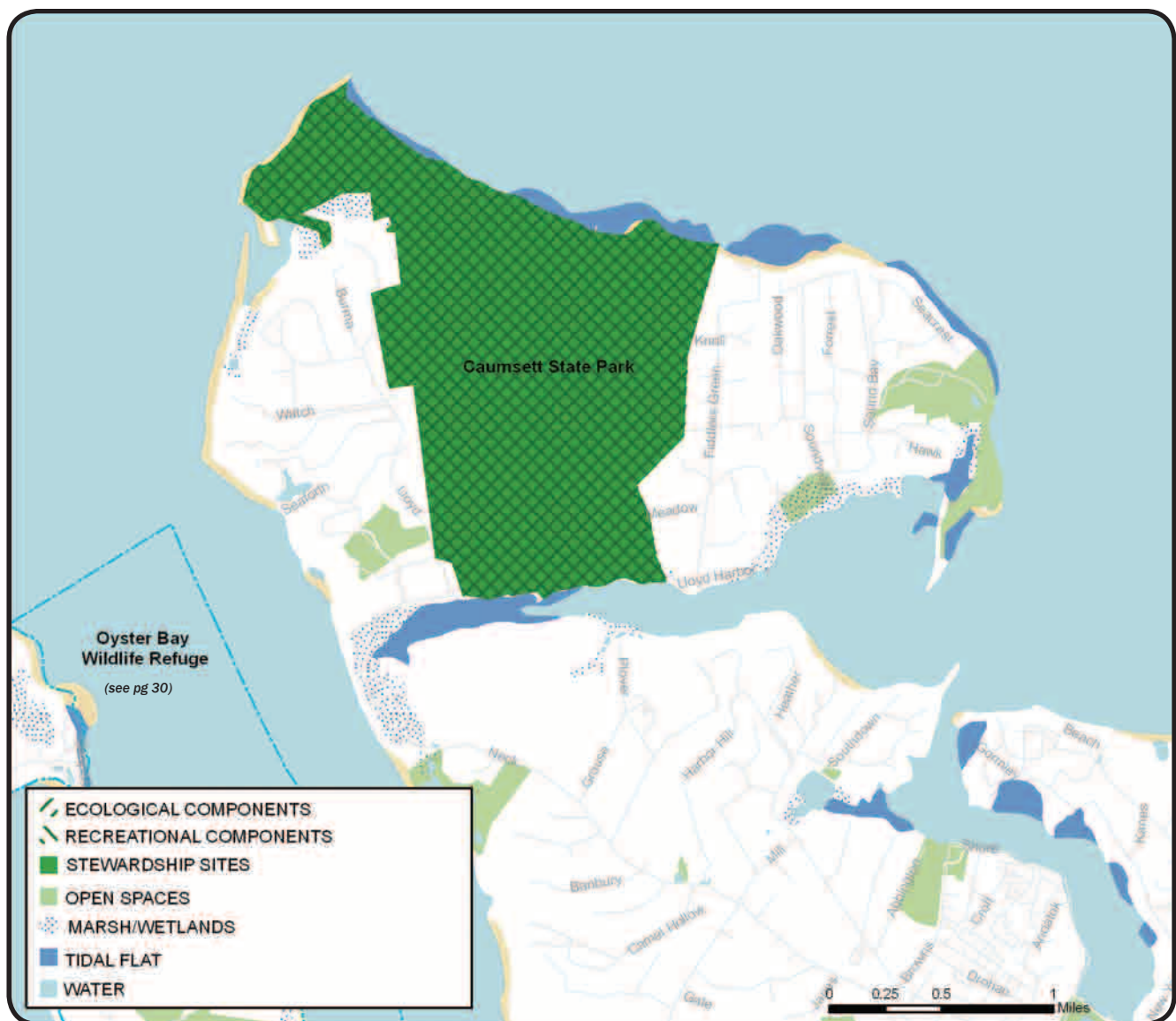
## Recreational significance:

- Marine education and coastal recreation opportunities with excellent swimming and boating facilities
- Includes undeveloped county parkland, interpretive trails, wildlife viewing and recreational fishing

*Pending passage of the federal Long Island Sound Stewardship Act, delineations of stewardship sites below mean high water may need to be redrawn.*



# Lloyd Neck Huntington, New York -



## Stewardship Sites: Caumsett State Park

### Ecological significance:

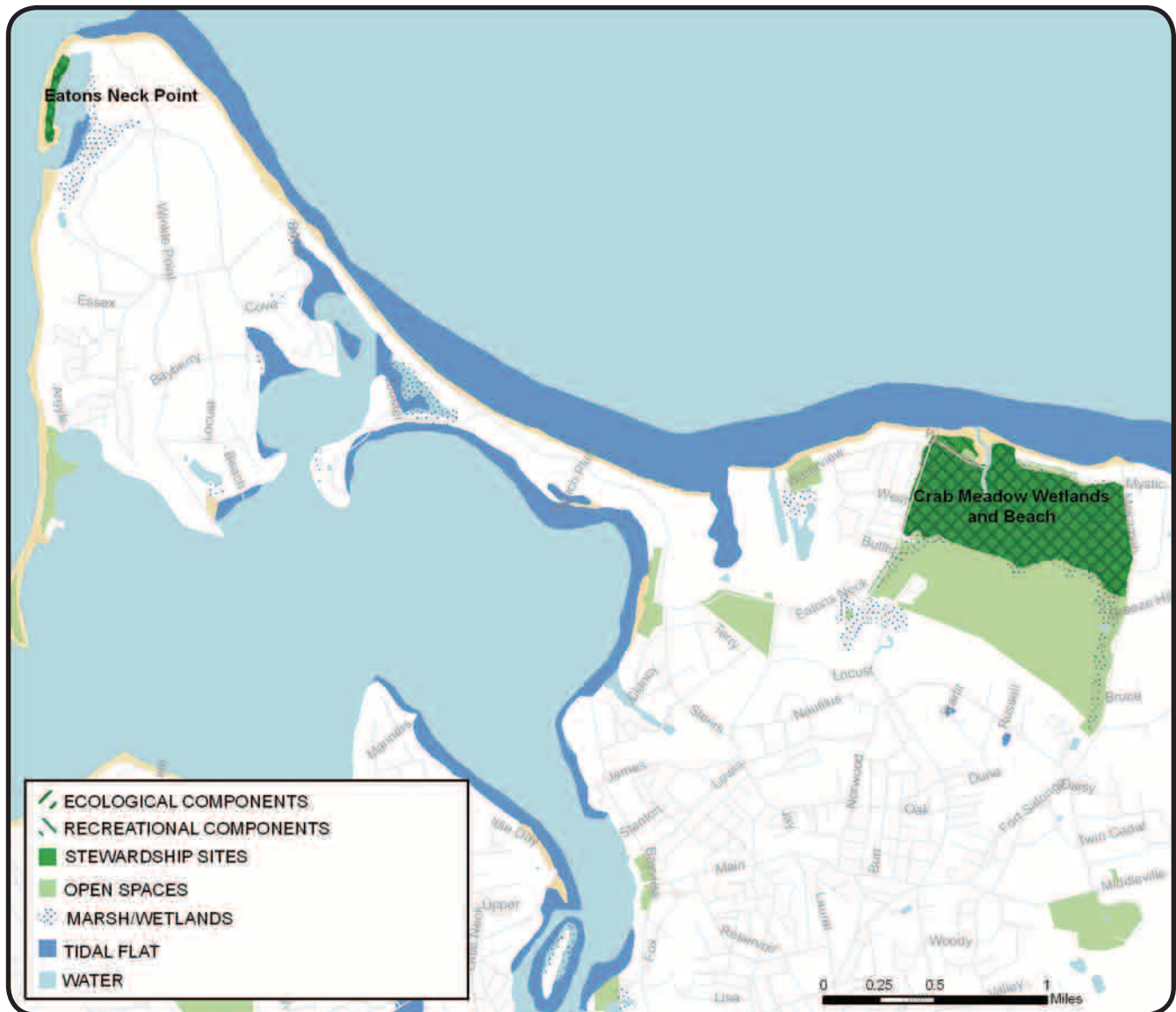
- Largest and most diverse coastal forest on the north shore of Long Island, including coastal oak-hickory forest, oak tulip tree forest, tidal mudflats, a maritime beach, mature woodlands, a freshwater pond, bluffs and open fields
- Includes a site designated as a Bird Conservation Area
- Includes areas designated as New York State Significant Coastal Fish and Wildlife Habitat
- Provides forage areas for least terns, common terns, and black skimmers

### Recreational significance:

- Features miles of bridle paths, hiking, biking, cross-country skiing, and nature trails that provide excellent wildlife viewing opportunities
- Provides access for fishing, swimming and SCUBA diving
- Recreational fishing areas
- Outstanding environmental programs and field studies



## Crab Meadow Huntington and Smithtown, New York -



### **Stewardship Sites:** Crab Meadow Wetlands and Beach and Eatons Neck Point

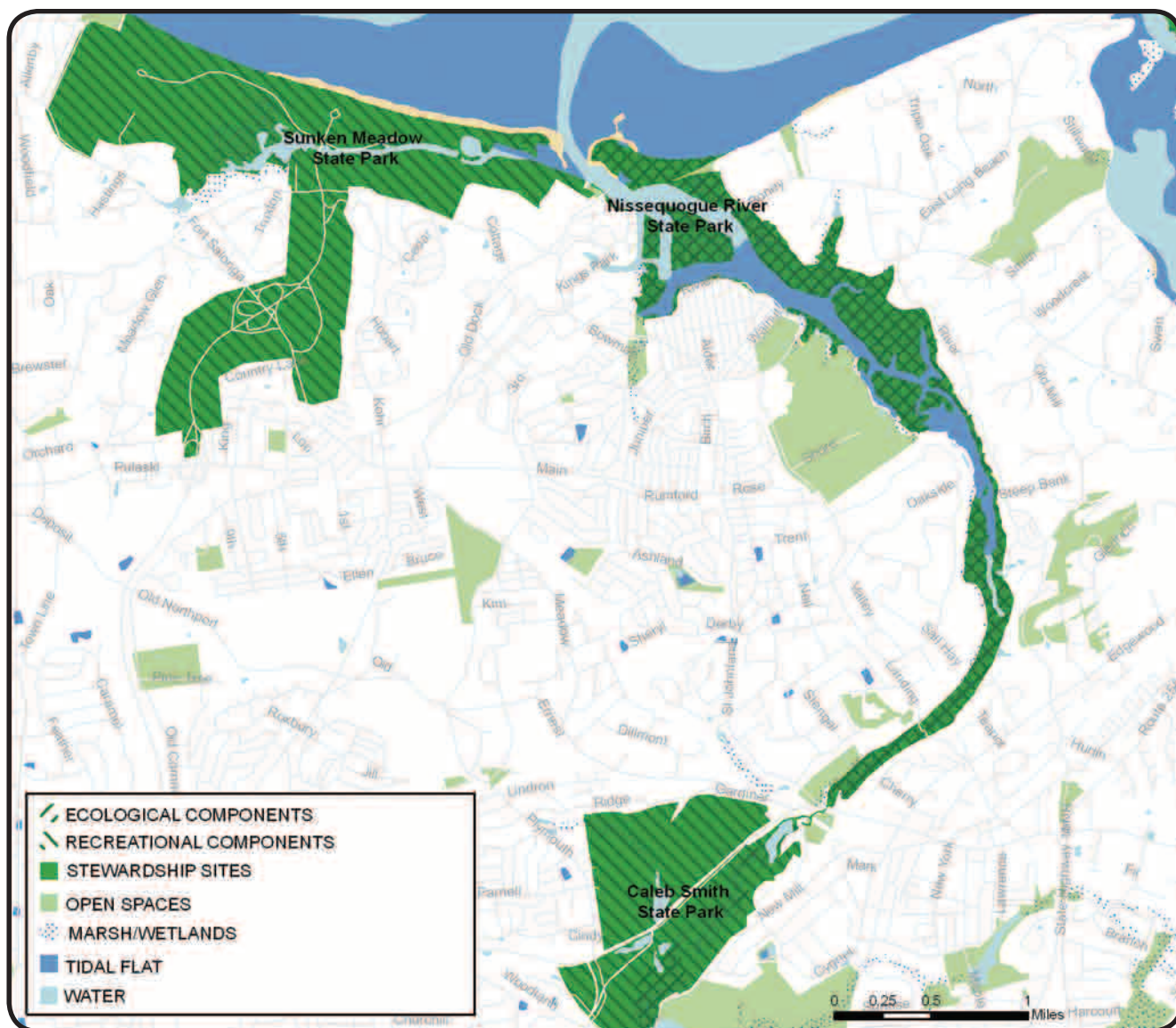
#### **Ecological significance:**

- One of the few large areas (approximately 300 acres) of undeveloped salt marsh ecosystems remaining on the north shore of Long Island
- Includes areas designated as New York State Significant Coastal Fish and Wildlife Habitat
- Important nesting area for piping plovers and least terns

#### **Recreational significance:**

- Includes two boat ramps
- Includes an important swimming beach and a popular surf casting fishing site
- Coastal marine education center may be developed

# Nissequogue River Smithtown, New York -



## **Stewardship Sites:** Nissequogue River, Caleb Smith, and Sunken Meadow State Parks

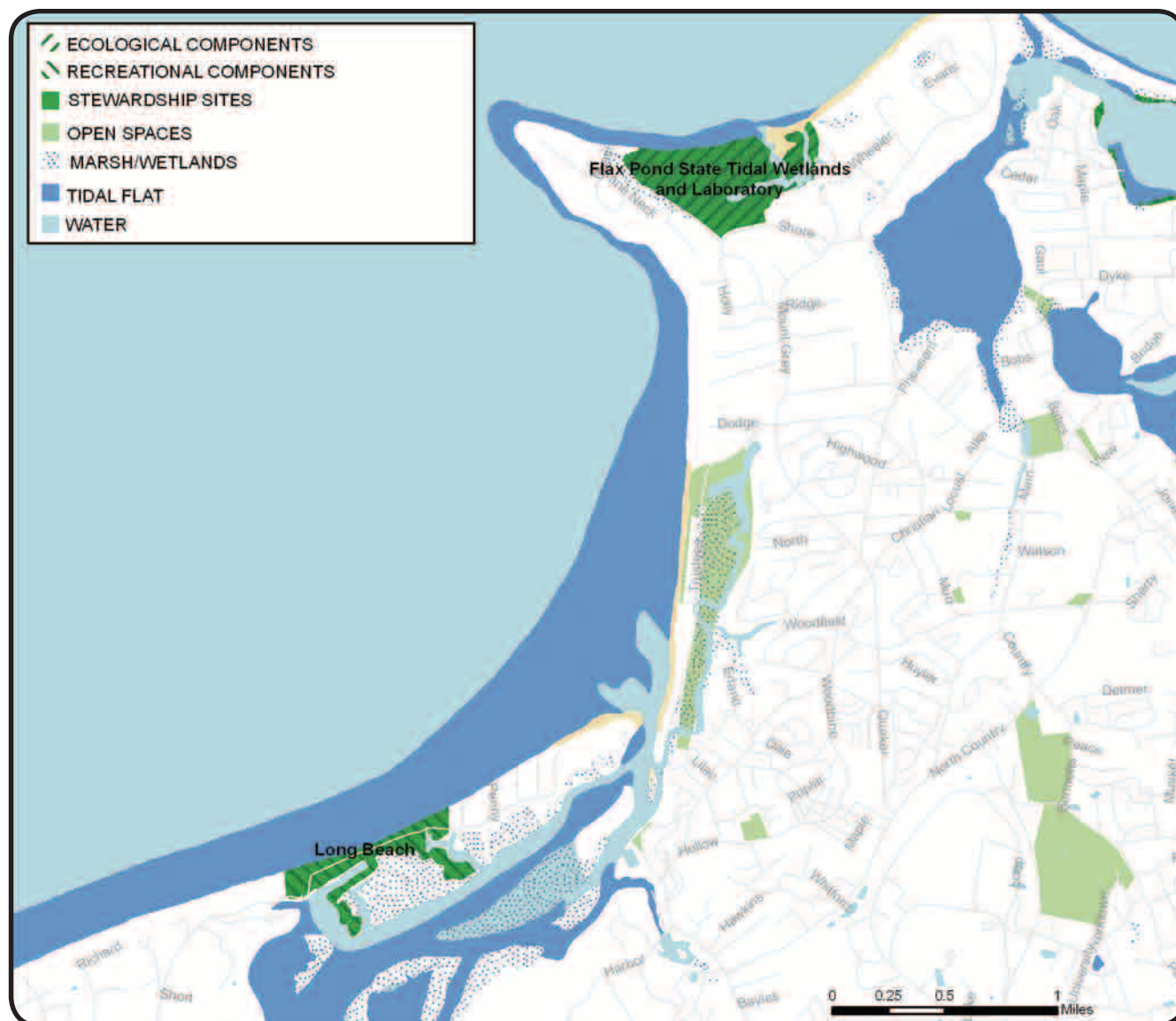
### **Ecological significance:**

- Exemplary riverine habitat – the only major tidal river draining into Long Island Sound where the coastal portion remains in relatively undisturbed condition
- One of the largest coastal wetlands on the north shore
- Includes diverse habitats, including intertidal mudflats, brackish tidal wetlands, freshwater wetlands, a rare red maple black gum swamp and coastal forests
- Supports a sea-run fishery for brown trout
- Includes areas designated as New York State Significant Coastal Fish and Wildlife Habitat
- Includes a 100-acre site designated as a Bird Conservation Area

### **Recreational significance:**

- Fisheries resources support recreational fishing of regional significance
- Excellent fishing and boating access and wildlife viewing opportunities
- Includes hiking trails that are part of the Greenbelt Trail
- Important swimming beach
- Coastal education opportunities at nature center and museum

# Stony Brook Harbor Brookhaven, New York -



**Stewardship Sites:** Flax Pond State Tidal Wetlands and Laboratory and Long Beach

## Ecological significance:

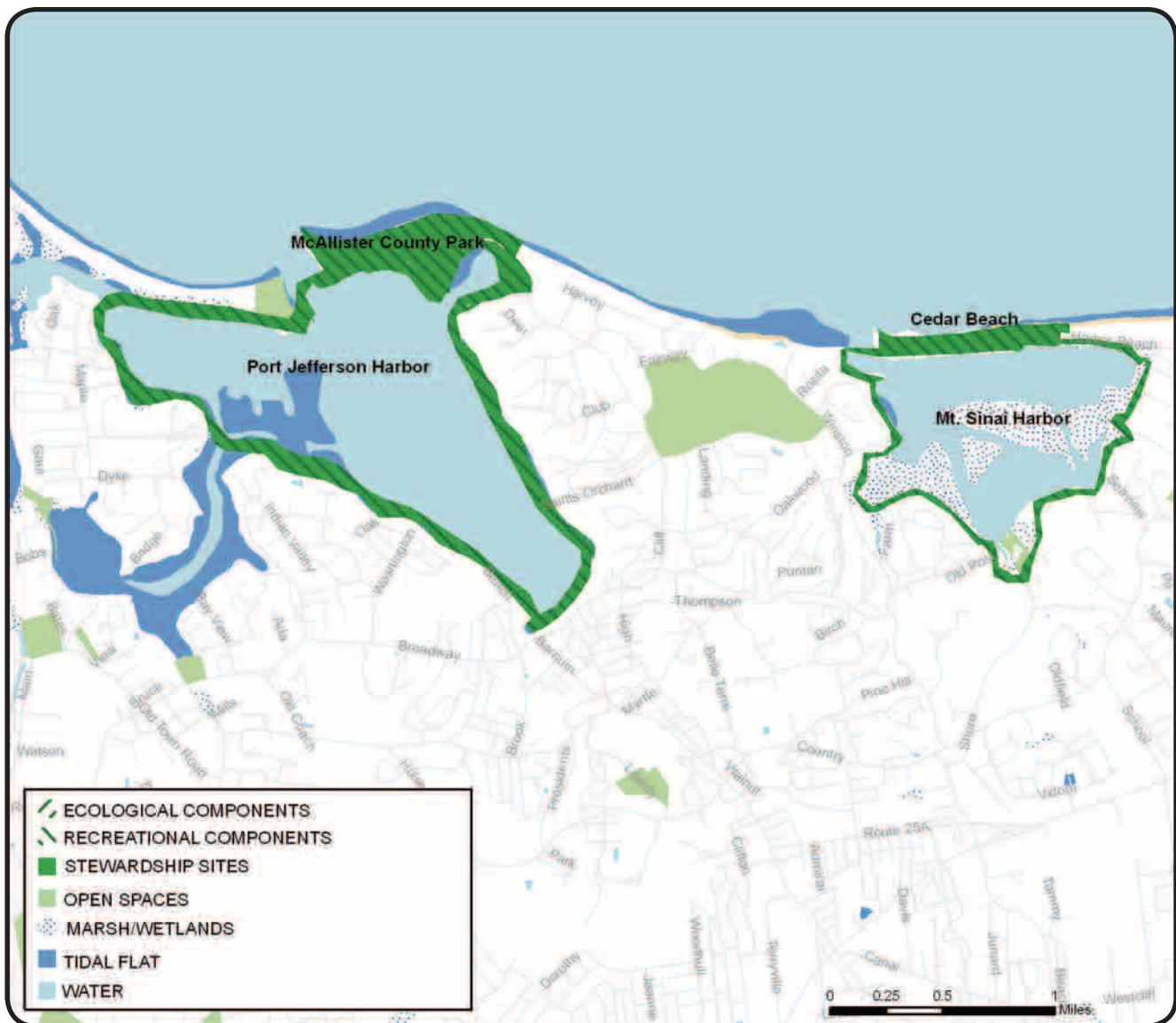
- Over a 1,000 acres of diverse tidal wetlands
- Provides habitat for diverse species of colonial waterbirds
- Provides important spawning sites for horseshoe crabs
- Research and education marine laboratory
- Includes areas designated as New York State Significant Coastal Fish and Wildlife Habitat

## Recreational significance:

- Excellent swimming, boating and fishing access
- New opportunities for ecological restoration, environmental education and expansion of recreational opportunities exist



# Mt Sinai-Port Jefferson Harbor Brookhaven, New York -



**Stewardship Sites:** McAllister County Park, Cedar Beach, and Mt. Sinai and Port Jefferson Harbors

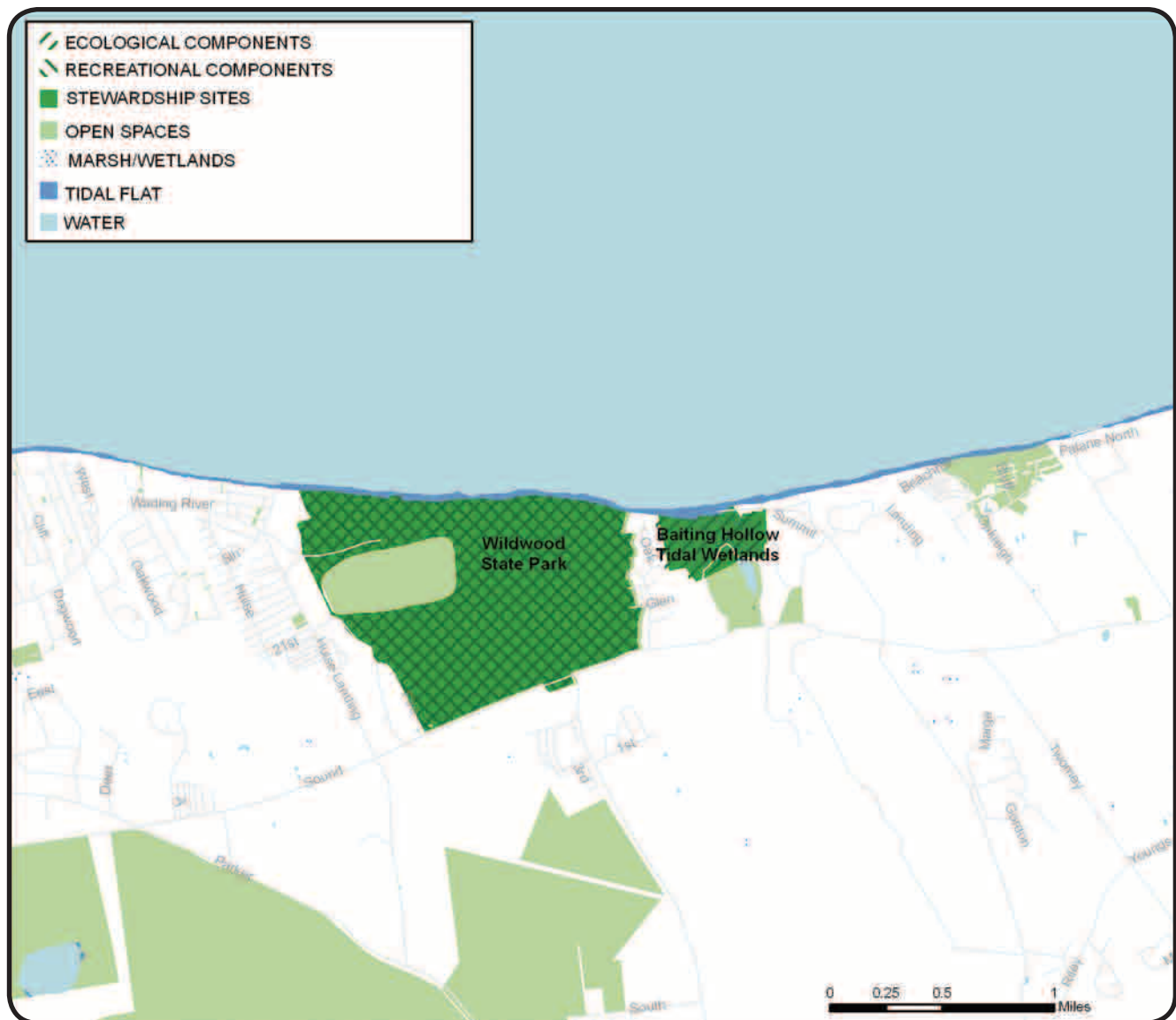
## **Recreational significance:**

- Exemplary boating opportunities provided by eight marinas and three boat ramps
- Includes excellent swimming beaches and great access for saltwater fishing
- Coastal education nature center
- Observation of wading birds and waterfowl including piping plovers, least terns, and common terns
- Important fishery for shellfish (e.g., hard and soft clams) and finfish (e.g., winter flounder)
- Includes areas designated as New York State Significant Coastal Fish and Wildlife Habitat
- Includes areas designated as part of the National Coastal Barrier Resources System

*Pending passage of the federal Long Island Sound Stewardship Act, delineations of stewardship sites below mean high water may need to be redrawn.*



# Shoreham - Wading River Riverhead, New York -



## **Stewardship Sites:** Wildwood State Park and Baiting Hollow Tidal Wetlands

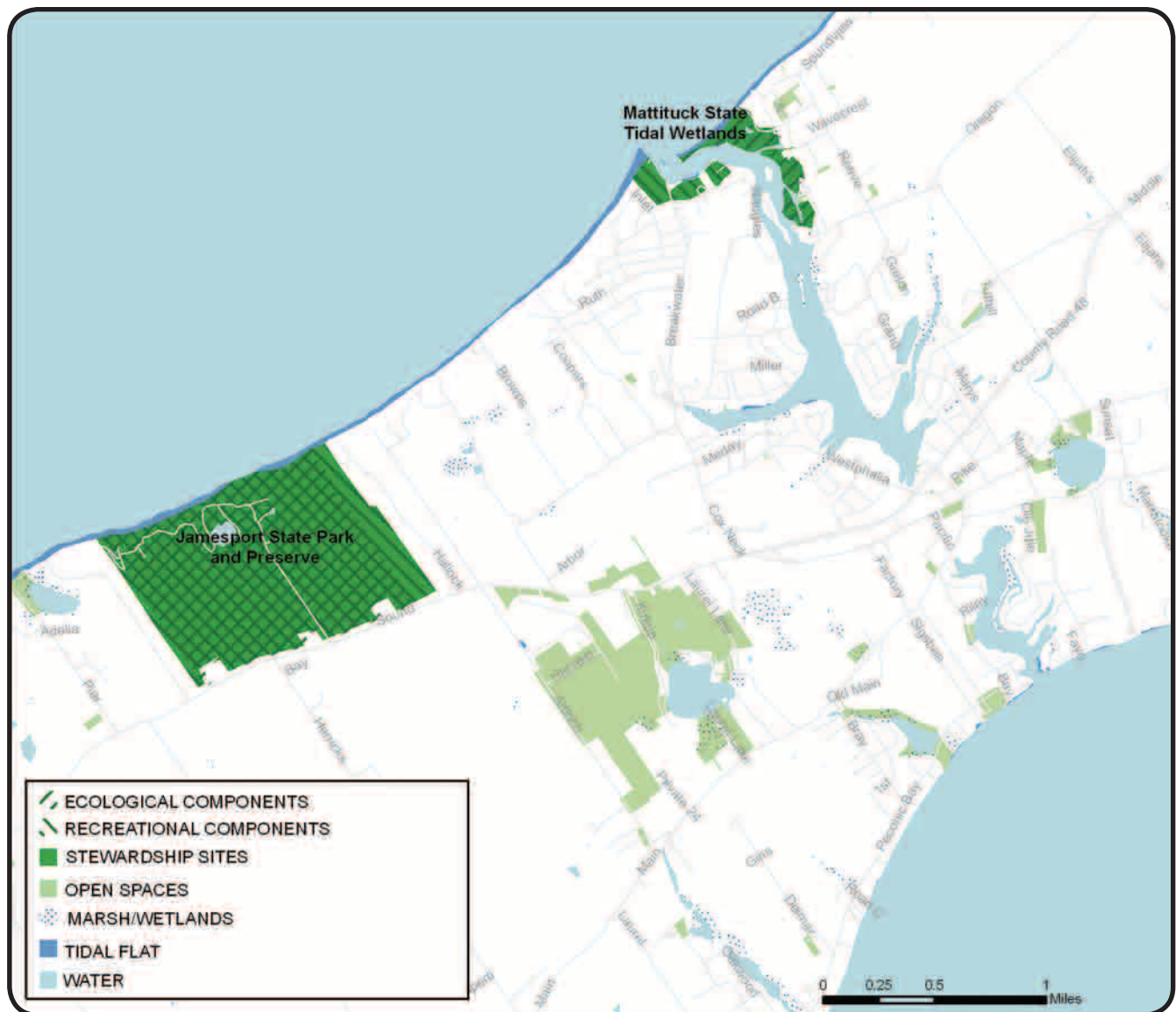
### **Ecological significance:**

- Relatively undisturbed salt marsh and maritime beach complex that are rare on the north shore of Long Island in Suffolk County
- An important nesting site for piping plover and least tern
- Includes areas designated as New York State Significant Coastal Fish and Wildlife Habitat
- Includes over 15 acres of barrier beach
- Provides habitat for silverweed, a state-threatened plant species, and saltmarsh bulrush, a state-endangered plant species
- Exemplary bluff habitat supports a globally-rare maritime beech forest
- Sand shoal habitat supports sandlance, which is a food source for tern populations

### **Recreational significance:**

- Excellent swimming beaches, over 11 miles of hiking trails, camping opportunities and significant saltwater fishing access
- Includes a boat ramp for small boats to enter the Sound
- Potential areas for public access and recreational opportunities exist

# Jamesport - Mattituck Creek Southold, New York -



**Stewardship Sites:** Jamesport State Park and Preserve and Mattituck State Tidal Wetlands and Waterways Access

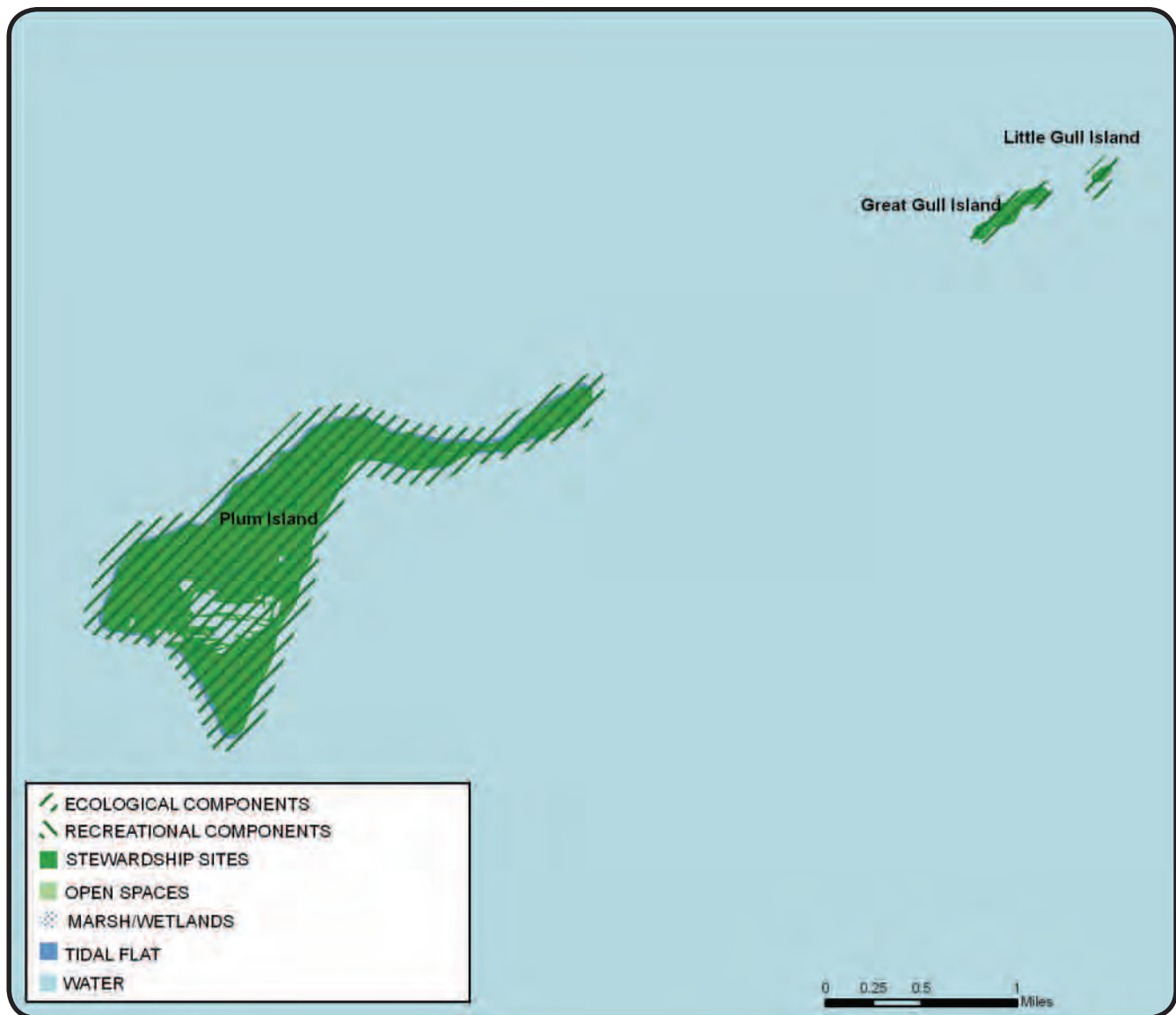
## Ecological significance:

- Includes a variety of freshwater wetland types that are not typical on the north shore of Long Island
- Undisturbed tidal wetlands provide habitat for nesting osprey
- Includes areas designated as New York State Significant Coastal Fish and Wildlife Habitat

## Recreational significance:

- State-owned properties will provide public access opportunities for all state residents in the future
- Includes two municipal boat ramps
- Excellent swimming, fishing, and SCUBA diving opportunities
- Includes newly-renovated facilities
- Only protected harbor for small boats (for refuge and for mooring/access) from Mt. Sinai to Orient Point

## Plum & Gull Islands Southold, New York -



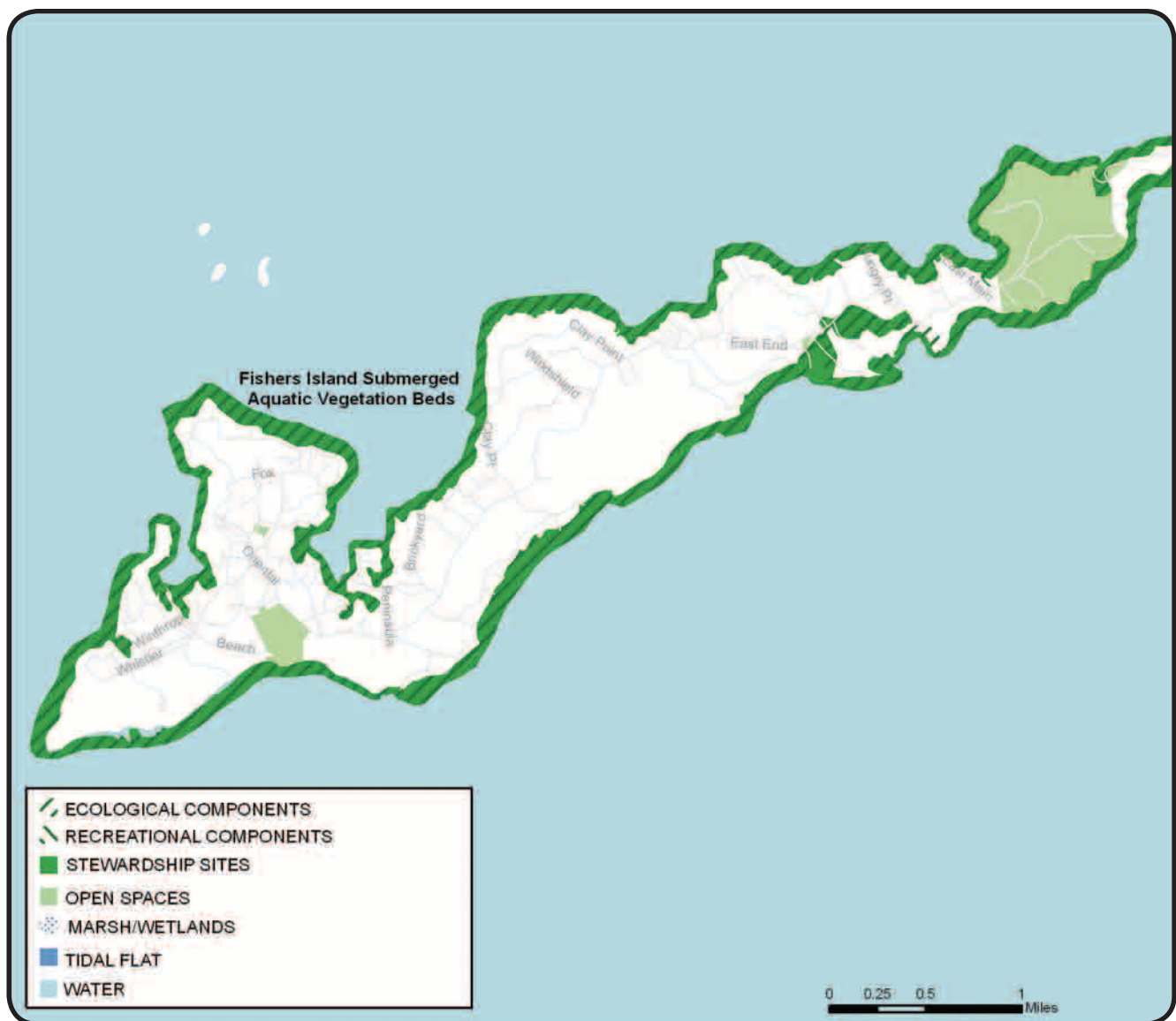
### **Stewardship Sites:** Plum Island, Little Gull Island, and Great Gull Island

#### **Ecological significance:**

- Exemplary colonial waterbird habitat, including sites that are of national – if not international – significance
- Small rocky islets dominated by grassy and herbaceous vegetation
- Colonized by over 6,000 pairs of common tern and approximately 1,200 pairs of roseate tern, making this the second largest breeding population of this endangered species in North America
- Identified by the USFWS as a Significant Coastal Habitat

*Pending passage of the federal Long Island Sound Stewardship Act, delineations of stewardship sites below mean high water may need to be redrawn.*

## Fishers Island Coastline Southold, New York -



### **Stewardship Site:** Fishers Island Submerged Aquatic Vegetation Beds

#### **Ecological significance:**

- Exemplary submerged aquatic vegetation habitat and rocky reef habitat
- Includes 98% of the eelgrass meadows in NY waters of Long Island Sound
- Provides critical habitat for bay scallops
- Designated as New York State Significant Coastal Fish and Wildlife Habitat

*Pending passage of the federal Long Island Sound Stewardship Act, delineations of stewardship sites below mean high water may need to be redrawn.*





## Parks, Rani

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**From:** john.dugan@gsa.gov  
**Sent:** Thursday, June 03, 2010 8:03 AM  
**To:** Jenkins, Josh; Stelmack, Mark  
**Cc:** phil.youngberg@gsa.gov  
**Subject:** audubon society comments  
**Attachments:** Plum Island Bird Surveys 5-20-10.doc; comments EIS 6-2-10.doc

FYI

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John L. Dugan  
Real Property Utilization & Disposal Division  
U.S. General Services Administration  
10 Causeway Street, Room 925  
Boston, MA 02222  
Office: 617.565.5709  
Cell: 617.921.0431  
Fax: 617.565.5720

----- Forwarded by John L. Dugan/1P/R01/GSA/GOV on 06/03/2010 08:03 AM -----

"BRESLIN, Sandy" <[sbreslin@audubon.org](mailto:sbreslin@audubon.org)>

To "[john.dugan@gsa.gov](mailto:john.dugan@gsa.gov)" <[john.dugan@gsa.gov](mailto:john.dugan@gsa.gov)>

cc

Subject

06/03/2010 12:13 AM

Dear Mr. Dugan,

Attached please find the comments of Audubon Connecticut to the EIS Public Scoping Process regarding the proposed sale of Plum Island, New York. I have also attached a copy of the bird survey data compiled by our sister organization Audubon New York during the past three years.

I look forward to working with you during the upcoming months to develop a recommendation regarding the future of Plum Island that will preserve the significant natural resources of the island for future generations.

Very truly yours,

Sandy Breslin

Director of Governmental Affairs  
Audubon Connecticut  
185 East Flat Hill Road  
Southbury, CT 06488  
(203) 264-5098 x307 phone  
(203) 264-6332 fax  
(203) 804-0488 cell







91	Sanderling								5
92	Savannah Sparrow								4
93	Sharp-shinned Hawk	1	1						
94	Song Sparrow <sup>C</sup>	4	3	13	16	2	22	41	25
95	Spotted Sandpiper <sup>C</sup>				5			4	1
96	Surf Scoter	300	1	2		2			
97	Swamp Sparrow								5
98	Tree Swallow			1	20		5	8	1
99	Tufted Titmouse	1		1				1	1
100	Turkey Vulture <sup>P</sup>		2	2			2		1
101	White-eyed Vireo <sup>P</sup>			4	9		8	10	9
102	White-crowned Sparrow								1
103	White-throated Sparrow	12	5			10			46
104	White-winged Scoter	36	4			3			4
105	Willow Flycatcher			1				1	
106	Winter Wren								1
107	Yellow Warbler <sup>C, P</sup>			11	10		25	17	16
108	Yellow-rumped Warbler		6						139
	<b>TOTAL # Individuals</b>	<b>1120</b>	<b>443</b>	<b>662</b>	<b>786</b>	<b>585</b>	<b>2078</b>	<b>1278</b>	<b>1458</b>
	<b>TOTAL # Species</b>	<b>37</b>	<b>36</b>	<b>43</b>	<b>43</b>	<b>34</b>	<b>42</b>	<b>50</b>	<b>56</b>

<sup>C</sup> Confirmed Breeding

<sup>P</sup> Probable Breeding

June 2, 2010

Mr. Phil Youngberg, Environmental Manager  
c/o Mr. John Dugan  
General Services Administration (GSA)  
10 Causeway Street  
Room 925  
Boston, MA 02222

Re: Comments of Audubon Connecticut to the Environmental Impact Statement (EIS)  
Public Scoping Process for the Proposed Sale of Plum Island, New York.

Dear Mr. Youngberg:

On behalf of Audubon Connecticut, the state organization of the National Audubon Society, I thank you for the opportunity to comment on the scope of EIS for the sale of Plum Island, New York. Due to its high ecological value, Plum Island has been identified by the EPA Long Island Sound Study (LISS) as an inaugural Long Island Sound (LIS) Stewardship Area, one of 33 such sites identified in New York and Connecticut. The island has also been recognized by Audubon New York as part of a critical Important Bird Area (IBA) that includes Great Gull Island and Orient Point. These classifications reflect the rich array of wildlife and habitat types present on Plum Island. In preparing the Draft EIS, Audubon Connecticut strongly urges you to:

- Conduct a complete ecological survey of the flora and fauna of the property, which has been largely off limits to such surveys for many years
- Undertake a complete analysis of the extent and degree of contamination present on the property, and the costs of remediating any such contamination
- Extend the length of time for the EIS to at least one year in order to acquire the data necessary to make an informed recommendation regarding disposition of the site
- Explore adaptive re-use of the existing facilities without expanding the footprint of development on the island
- Strongly consider the "No Action" alternative pursuant to the provisions of the National Environmental Policy Act (NEPA)
- Recommend permanent protection and preservation of the large undeveloped portions of Plum Island, preferably as part of the U.S. Fish and Wildlife Service (USFWS) National Wildlife Refuge System

Audubon Connecticut's mission is to protect birds, other wildlife, and their habitats through education, science and conservation, and legislative advocacy for the benefit of humanity and the earth's biological diversity. Through our network of nature education centers, protected wildlife sanctuaries, and local, volunteer Chapters, we seek to connect people with nature and inspire the next generation of conservationists. To help guide our conservation actions, Audubon Connecticut has identified 27 Important Bird

Areas throughout the Connecticut that provide critical habitat for birds based on the standardized set of criteria, the majority of which are associated with Long Island Sound. We are also engaged in large scale ecosystem protection and restoration campaigns along the shoreline, and have been a leader in efforts to secure federal funds desperately needed to improve water quality and restore the important habitats of the Sound. Audubon Connecticut is an active member of the EPA LISS, the LISS Stewardship Work Group, and currently serves as co-chair of the Policy Committee of the LISS Citizen Advisory Council.

### **Plum Island is recognized as a unique natural asset in Long Island Sound**

The 843 acres of Plum Island have been recognized as an exemplary natural area worthy of protection by our federal and state governments, and many nongovernmental organizations. In September 2006, the Region I and II EPA Administrators, along with the Environmental Commissioners of New York and Connecticut, formally recognized 33 inaugural Stewardship Areas around the Sound with significant ecological and/or recreational value and endorsed a resolution calling for the permanent protection, restoration, and/or conservation of these areas, including Plum Island. Consistent with EPA's Comprehensive Conservation and Management Plan, and growing out of a multi-year and multi-stakeholder public process, the Stewardship Initiative aims to protect key ecological resources and increase public access to appropriate recreational and educational opportunities in the Sound.

### **Plum Island hosts state and federally significant avian resources**

Our sister organization, Audubon New York has recognized Plum Island as an Important Bird Area due to the number and diversity of species documented, and the range of habitat types present on the island. During the past three years, Audubon New York has documented more than 100 bird species on Plum Island and in adjacent coastal waters. In 2009, seven active Osprey nests and an active Bank Swallow colony were observed, the latter a species on decline in New York. Piping Plovers, a federally threatened species, utilize the shoreline habitat for breeding and foraging. Several dozen Roseate Terns, a federally endangered species, and several hundred Common Terns, a New York State threatened species, also use the island. The waters surrounding Plum Island are rich in nutrients and provide vital feeding and courting grounds for birds such as terns and waterfowl. Plum Island likely provides critical stopover habitat for many fall migrant songbird and shorebird species, but further documentation is needed to better understand avian usage of this area.

### **Plum Island has been inaccessible for decades and we lack information key to understanding whether development of the island is desirable or feasible.**

Before any decision can be made about future use or sale of the Plum Island, Audubon Connecticut strongly recommends the following data gathering and analyses be performed:

- A thorough inventory and assessment of the wildlife, biological and ecological functions, and potential restoration opportunities on the island and associated marine environment. A minimum of twelve months will be needed to collect this critical data.
- A comprehensive analysis of the level of appropriate public uses and development that could feasibly be supported by the island, while protecting critical environmental resources.

- A complete assessment of any toxic and hazardous contamination, as well as potential health threats associated with the existing disease research facility. This assessment should focus on both the existing developed infrastructure of the island, as well as on potentially contaminated natural features such as soil, groundwater and associated wetland habitats. This information is essential to developing a rigorous remediation plan.
- An assessment of the carrying capacity of groundwater on the island and the impact of development alternatives on water resources.
- An economic analysis of the benefits of wildlife-related tourism and recreation to the local economy versus other potential uses for the island.

### **Consider the alternatives**

- Audubon Connecticut strongly endorses the “No Action” alternative that would maintain Plum Island in federal ownership. As surplus land, it can be transferred to USFWS for inclusion in the National Wildlife Refuge System. USFWS has a mandate to protect species and habitats, while also providing for public recreation and enjoyment.
- A less preferable alternative would be a “Limited Action” alternative that would allow for a sale that permanently protects the undeveloped portion of the island (approximately 90% of the 843 acres) while allowing for adaptive re-use and appropriate future commercial or other development.
- Under any alternative, public access to the island should be provided by reserving some form of public access rights from the associated Orient Point property. To achieve this end, the undeveloped portions of the island should be transferred or sold separately to an organization or agency whose mission is to conserve, manage and restore the natural features of this island, subject to strict conservation restrictions. We believe the undeveloped portion of the island should become part of the National Wildlife Refuge system administered by the U.S. Fish and Wildlife Service (USFWS).

### **Wildlife-associated tourism and recreation is big business.**

Permanently protecting Plum Island not only makes good environmental sense, but it makes good fiscal policy as well. Wildlife-associated recreation is big business and bird watching is the fastest growing outdoor recreation in New York and across the nation. In 2006 3.8 million bird watchers in New York contributed \$1.6 billion to the state economy. Ensuring the long term protection of this critical area, that supports such a great diversity of bird species, will help communities surrounding Plum Island to continue to capitalize on this ecotourism revenue.

### **Plum Island is a unique public resource in Long Island Sound.**

The area is already in public ownership and the small amount of data currently available on its natural resources strongly suggests that it should remain in public ownership as a natural asset benefitting the people of New York and the nation. On behalf of Audubon Connecticut, I urge you to recommend a creative alternative that supports the permanent protection of this important habitat area. I look to working with you during the upcoming EIS process to ensure a as this outcome.



Respectfully yours,

Alexandra Breslin  
Director of Governmental Affairs

cc: Congressman Timothy Bishop  
Senator Charles Schumer  
Senator Kirsten Gillebrand  
Congressman Joe Courtney  
Congresswoman Rosa DeLauro  
Congressman James Himes  
Congressman Christopher Murphy  
Congressman John Larson  
Senator Christopher Dodd  
Senator Joseph I. Lieberman  
Supervisor Scott Russell, Town of Southold, New York

## Bourdeau, Jonathan

---

**From:** Bourdeau, Jonathan  
**Sent:** Thursday, June 03, 2010 3:34 PM  
**To:** Parks, Rani  
**Subject:** FW: [Fwd: Plum Island Scoping Comments - Fishers Island Conservancy]  
**Attachments:** PlumIsland\_ScopingComments\_FIConservancy\_060210.pdf

---

**From:** Jenkins, Josh  
**Sent:** Thursday, June 03, 2010 10:07 AM  
**To:** Bourdeau, Jonathan  
**Subject:** FW: [Fwd: Plum Island Scoping Comments - Fishers Island Conservancy]

FYI

**Josh Jenkins**  
**770.421.3412**

---

**From:** john.dugan@gsa.gov [mailto:john.dugan@gsa.gov]  
**Sent:** Thursday, June 03, 2010 9:54 AM  
**To:** mpurnell@snet.net  
**Cc:** Jenkins, Josh; Stelmack, Mark; phil.youngberg@gsa.gov  
**Subject:** Re: [Fwd: Plum Island Scoping Comments - Fishers Island Conservancy]

Ms. Purnell,

Thank you for forwarding your comment to me, I will enter your comments into the record. Please visit [www.plumislandny.com](http://www.plumislandny.com) for project updates.

---

John L. Dugan  
Real Property Utilization & Disposal Division  
U.S. General Services Administration  
10 Causeway Street, Room 925  
Boston, MA 02222  
Office: 617.565.5709  
Cell: 617.921.0431  
Fax: 617.565.5720

Marguerite Purnell <[mpurnell@snet.net](mailto:mpurnell@snet.net)>

06/03/2010 09:44 AM

To John Dugan <[john.dugan@gsa.gov](mailto:john.dugan@gsa.gov)>  
cc  
Subject [Fwd: Plum Island Scoping Comments - Fishers Island Conservancy]

Good morning Mr. Dugan,

I received an email notice this morning that Mr. Youngberg is out of the office. He suggested that any Plum Island Scoping comments be forwarded to you while he is gone. As such, I am forwarding the comments from

the Fishers Island Conservancy which were emailed to Mr. Youngberg yesterday.

Sincerely,  
Marguerite W. Purnell, Director  
Fishers Island Conservancy

----- Original Message -----

**Subject:** Plum Island Scoping Comments - Fishers Island Conservancy

**Date:** Wed, 02 Jun 2010 17:29:23 -0400

**From:** Marguerite Purnell <[mpurnell@snet.net](mailto:mpurnell@snet.net)>

**To:** [phil.youngberg@gsa.gov](mailto:phil.youngberg@gsa.gov)

Mr. Youngberg,

Attached please find Scoping comments from the Fishers Island Conservancy. Please let me know if you have any problems with the attachment. As stated in our comments we look forward to ongoing participation and cooperation during the EIS process.

Sincerely,  
Marguerite W. Purnell, Director  
Fishers Island Conservancy

FISHERS ISLAND CONSERVANCY, INC.



BOX 553  
FISHERS ISLAND, NEW YORK 06390

Mr. Phil Youngberg, Environmental Manager  
c/o Mr. John Dugan  
General Services Administration  
10 Causeway Street, Room 925  
Boston, MA 02222

June 2, 2010

**RE: Scoping Comments - EIS for the Public Sale of Plum Island, NY**

Dear Mr. Youngberg,

The Fishers Island Conservancy (FIC) is pleased to submit these additional comments to augment our brief oral comments that were made during the May 19<sup>th</sup>, 2010 Scoping Meeting in Old Saybrook, CT.

The Fishers Island Conservancy is a small nonprofit located on Fishers Island in the eastern portion of Long Island Sound. Our mission is to "protect and preserve the natural resources of Fishers Island and its surrounding waters," and we have worked for 25 years in furtherance of this mission.

The FIC Board of Directors met recently and voted unanimously to support the proposal put forth by the Preserve Plum Island Coalition (PPIC) that "all or a significant majority of the island be protected as a National Wildlife Refuge, administered by the U.S. Fish and Wildlife Service." We concur with the statements made in PPIC's case statement which describes the unique assemblage of natural and cultural features found on Plum Island, and makes a compelling argument for preservation together with limited public access. It also bears mention that preservation of Plum Island as a National Wildlife Refuge does not necessarily preclude adaptive reuse of the existing island facilities which are uniquely suited to remain some form of research facility.

**Background**

Fishers Island is the easternmost island in a group that includes (from east to west) Little Gull Island, Great Gull Island and Plum Island. These islands were formed during the last (Wisconsin) glaciation, and each are remnants of the Harbor Hill moraine, the northernmost of the two recessional moraines that underlie Long Island. Fishers Island shares many natural resource features with Plum Island, and as such many of the species and habitat types that have been documented on Fishers Island can be expected to be found on Plum Island.

The natural resources found on Fishers Island are many and varied. There are estuarine embayments, tidal marshes, brackish ponds, freshwater wetlands, rocky beaches and offshore islands, tidal flats, bluffs, eelgrass meadows, Maritime grassland, various swamp habitats (including Red Maple-Hardwood swamp and Shrub swamps) as well as a number of different forest habitats (Oak forest and Oak-Hickory forest, Pitch Pine-Oak forest, Maritime Oak forest and a globally rare Maritime Beech forest). Over 45 rare



plants have been found on Fishers Island and more than 90 species of birds have been documented as breeding on Fishers Island (including Black Crowned Night Heron, Common Tern, Double Crested Cormorant, Fish Crow, Gadwall, Great Egret, King Rail, Least Tern, Northern Harrier, Osprey, Oystercatcher, Piping Plover and Snowy Egret. A number of reptiles and amphibians are found including Spotted Salamanders, historical records of Diamond-Backed Terrapins and Spotted Turtles and occasional sightings of Leather-back Turtles in The Race or washed up on Fishers Island's southern beaches.

Fishers Island's wealth of natural resources has garnered recognition at the local, state and federal level ranging from its 1989 designation as a Critical Environmental Area by Suffolk County, to its designations as Significant Coastal Fish & Wildlife Habitat by New York Department of State and US Fish & Wildlife Service and most recently as one of Inaugural Stewardship Sites identified by the Long Island Sound Stewardship Act and incorporated into the Long Island Sound Stewardship Initiative. The area between Orient Point and Fishers Island (including Plum Island and the two Gull Islands) was also identified as an Inaugural Stewardship Site.

### **Specific Scoping Suggestions**

At the Scoping Hearing we were encouraged to hear that a number of important ecological and biological categories are to be investigated as important components of the EIS, but we are concerned about the exceedingly short timeline for the data collection and EIS production. As such we offer the following comments:

1) In order to properly document the extent of the natural and wildlife resources of Plum Island, the EIS should include field inventory data incorporating, at the very least, one full year of data collection. Periodic data for birds on Plum Island has been collected by NY Department of Environmental Conservation (DEC) as well as The Audubon Society (in support of an Important Bird Area designation), but we are unaware of any long term wildlife studies or extensive natural resource inventories for Plum Island.

- ❖ Additional bird data should be collected during the fall migration and also during the winter months when flocks of overwintering birds are found.
- ❖ A thorough inventory of the plant species occurring on Plum Island should be conducted and should include aquatic species found in the freshwater wetlands and those found in adjacent estuarine waters. Field work should be conducted throughout the year (at a minimum) to ensure that all species have been identified and documented. Since it is now early June, the spring ephemerals have already come and gone; any plant species inventory generated during the summer months will miss this important group and as such we suggest that field work be conducted through at least the early spring of 2011.
- ❖ A thorough inventory of reptile and amphibian species should be conducted. It should include terrestrial species as well as marine species that likely use the surrounding water as feeding grounds (and possibly as breeding areas). Kemps Ridley Turtles are frequent visitors to Mount Sinai Harbor (located to the west of Plum Island on the north shore of LI) and Diamond-Backed Terrapin populations have been documented on Long Island.
- ❖ Additional data should be gathered on marine mammals to further the occasional seal count studies performed by the Riverhead Foundation.

- ❖ Fisheries data including Essential Fish Habitat areas should be compiled.
- ❖ Inventory data for invertebrates (both terrestrial and marine) should be compiled and additional field work should be initiated to develop this information.

2) The EIS should include a thorough evaluation of the estuarine waters (and habitats) immediately surrounding Plum Island including an assessment of the potential impacts of the various alternatives identified in the EIS. Plum Gut, located immediately to the west of Plum Island has been designated a Significant Coastal and Wildlife Habitat by the US Fish and Wildlife Service as has The Race, which is located to the east of Plum Island.

3) A detailed inventory of the locations of any hazardous waste, medical waste, biomedical ASTs/USTs, petroleum or other waste, underground piping runs, septic disposal systems, as well as any current and historic landfill areas and burn pits should be compiled together with estimates of the cost for remediation and/or removal.

4) As we mentioned at the Scoping Hearing, we encourage the preparers of the EIS to include a specific subheading under the Adaptive Reuse category that would evaluate a separate alternative examining Plum Island's use (in whole or in part) as a National Wildlife Refuge.

### **Conclusion**

In the face of burgeoning population growth along the New England coast together with recent consumptive land use practices that far outpace New England's population growth, this is a very rare opportunity to preserve an unusually large piece of property that remains relatively untrammelled. We sincerely hope that creative solutions can be identified during development of the EIS, and we look forward to continued participation in the EIS process. Thank you for your consideration of these comments.

For the Fishers Island Conservancy Board of Directors,

Nick Spofford, President

## Bourdeau, Jonathan

---

**From:** Jenkins, Josh  
**Sent:** Thursday, June 03, 2010 4:48 PM  
**To:** Bourdeau, Jonathan  
**Subject:** FW: FW: Comments on DEIS for sale of Plum Island  
**Attachments:** ANY Plum Island Comments 6-2-10.pdf; Plum Island Bird Surveys 6-2-10.pdf; OPPI Conservation Plan FINAL.pdf

**Josh Jenkins**  
**770.421.3412**

---

**From:** john.dugan@gsa.gov [mailto:john.dugan@gsa.gov]  
**Sent:** Thursday, June 03, 2010 1:05 PM  
**To:** cspilman@audubon.org  
**Cc:** Jenkins, Josh; Stelmack, Mark; phil.youngberg@gsa.gov  
**Subject:** Re: FW: Comments on DEIS for sale of Plum Island

Ms. Spilman,

Thank you very much, we received a similar letter from your Connecticut counterparts, so I will make sure your letter is entered into the record as well. Please monitor [www.plumislandny.com](http://www.plumislandny.com) for project updates.

---

John L. Dugan  
Real Property Utilization & Disposal Division  
U.S. General Services Administration  
10 Causeway Street, Room 925  
Boston, MA 02222  
Office: 617.565.5709  
Cell: 617.921.0431  
Fax: 617.565.5720

"SPILMAN, Carolyn" <[cspilman@audubon.org](mailto:cspilman@audubon.org)>

To "[john.dugan@gsa.gov](mailto:john.dugan@gsa.gov)" <[john.dugan@gsa.gov](mailto:john.dugan@gsa.gov)>  
cc

Subject FW: Comments on DEIS for sale of Plum Island

06/03/2010 12:30 PM

Hi Mr. Dugan,  
I am forwarding you this message that was originally sent to Mr. Youngberg before yesterday's deadline for Plum Island comments. I received an automated message from him indicating that he is out of the office and that comments could also be sent to you.  
Thanks,  
Carolyn

Carolyn Spilman  
Long Island Bird Conservation Coordinator  
Audubon New York

P. O. Box 202  
Orient, NY 11957  
Phone and fax: 631-323-8060

*To be successful in our conservation efforts, we need your help!*  
*Sign up for Audubon Alerts and the Advisory at <http://ny.audubonaction.org>.*

---

**From:** SPILMAN, Carolyn  
**Sent:** Wednesday, June 02, 2010 5:00 PM  
**To:** 'phil.youngberg@gsa.gov'  
**Cc:** 'Jillian Liner'; MAHAR, Sean; CACCESE, Al  
**Subject:** Comments on DEIS for sale of Plum Island

Mr. Phil Youngberg,  
Attached please find our comments regarding the scope of the EIS for the sale of Plum Island, NY. I've also attached here a bird list for Plum Island based on surveys conducted since 2007 and a conservation action plan for the Orient Point to Plum Island Important Bird Area to be included with our comments.  
Sincerely,  
Carolyn Spilman

Carolyn Spilman  
Long Island Bird Conservation Coordinator  
Audubon New York  
P. O. Box 202  
Orient, NY 11957  
Phone and fax: 631-323-8060

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# Audubon NEW YORK

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Mr. Phil Youngberg  
Environmental Manager  
c/o Mr. John Dugan  
General Services Administration  
10 Causeway Street, Room 925  
Boston, MA 02222

RE: Audubon New York Comments on the Draft Environmental Impact Statement for the Sale of Plum Island, NY.

Dear Mr. Youngberg:

On behalf of Audubon New York, the state program of the National Audubon Society representing 27 local chapters and nearly 50,000 members, I would like to thank you for the opportunity to provide the following comments regarding the scope of the Environmental Impact Statement (EIS) on the sale of Plum Island.

The mission of Audubon New York is to conserve and restore natural ecosystems, focusing on birds, other wildlife, and their habitats for the benefit of humanity and the earth's biological diversity. To guide our conservation efforts in achieving this mission, Audubon New York has identified 136 Important Bird Areas throughout the state that provide critical habitat for birds based on a set of standardized site criteria. In addition to identifying IBAs, Audubon New York is also engaged in large scale ecosystem restoration campaigns, and has been a leading force working to secure desperately needed federal funds to restore the water quality and protect the important habitats of Long Island Sound.

With its mixture of rocky shoreline, sand beaches, wetlands, and various upland shrub, grassland, and forest habitats, Plum Island stands out as a critically important migratory bird stopover site on Long Island Sound. In 1997 Plum Island was recognized as part of the Orient Point to Plum Island IBA because it supports a great diversity of at-risk species including large concentrations of waterbirds.

In 2005, to further the protection of this IBA, Audubon New York convened a group of partners to identify the greatest threats and conservation needs for this area. The result of that effort was the development of a Conservation Action Plan for the IBA that was finalized in 2009 and is available on our website (also attached). The plan emphasizes the need to protect the critical natural resources

of Plum Island and one of the priority strategies identified in the plan is to increase our understanding of bird usage on Plum Island. Over the last three years a total of nine bird surveys were conducted during the breeding, winter, and migration seasons. Over 100 bird species have been documented breeding or foraging on Plum Island and adjacent coastal waters through these surveys including birds-of-prey, shorebirds, wading birds, waterfowl, and songbird species (see attached). However, we know that these limited surveys are only providing us with a snapshot of the ecological worth of Plum Island and it is likely that far more species depend on it than we are aware.

In 2009, seven active Osprey nests were noted and the island also supported an active Bank Swallow colony, a bird species on the decline in New York. Piping Plovers, a federally threatened and New York State endangered species, utilize the shoreline habitat for breeding and foraging. Several dozen Roseate Terns, a federally endangered species, and several hundred Common Terns, a New York State threatened species, also use the island. The waters surrounding Plum Island are rich in nutrients and are vital feeding and courting grounds for birds such as terns and waterfowl. Plum Island likely provides critical stopover habitat for many fall migrant songbird and shorebird species, but this needs better documentation. Finally, Common Eiders, known to breed from nearby Fisher's Island, may also breed on Plum Island; if so this would be only the second location in the state where this sea duck breeds. All of this highlights the biologic importance of this island, and the need to ensure these unique natural assets are protected long term.

The Long Island Sound Study (LISS), through the Resolution of the Policy Committee dated September 28, 2006, formally adopted the policy to achieve the permanent protection, restoration, and conservation of Plum Island's vast undeveloped landscape, and to increase public access for appropriate recreation and education. This action was a part the Stewardship Initiative, where the LISS formally endorsed thirty-three inaugural Stewardship Areas around the Sound with significant ecological and/or recreational values. Plum Island is part of an exemplary stewardship area and is home to a number of unspoiled habitat types and federally endangered species, as previously mentioned. We remind you that the LISS endorsement was formally signed by all the members of its Policy Committee including the Region I and II Regional EPA Administrators and the Environmental Commissioners of New York and Connecticut, and representing a strong and unequivocal governmental interest in assuring the conservation of the undeveloped portions of Plum Island.

Protecting this area long term not only makes good environmental sense, but represents good fiscal policy as well. Bird watching is the fastest growing outdoor recreation in New York and across the nation, and in 2006 3.8 million bird watchers in New York contributed \$1.6 billion to the state economy. Ensuring the long term protection of this critical area, that supports such a great diversity of bird species, will help communities surrounding Plum Island to continue to capitalize on this ecotourism revenue.

As the U.S. General Services Administration prepares the EIS for the sale of Plum Island, we recommend a thorough and comprehensive biological inventory of the island be

performed to further document and expose significant species and natural communities. In order to be fully comprehensive, this inventory should be conducted over the course of a full year in order to accurately capture use of the island by breeding, migrant, and wintering populations of wildlife as well as the extent and characterizations of the habitats that support them on the island. This information should be used to guide the protection of critical areas if and when the ownership of the island changes. While there are numerous options and strategies available to safeguard the island's resources, Audubon New York strongly supports all or a significant majority of the island be protected, possibly as a National Wildlife Refuge, administered by the U.S. Fish and Wildlife Service. We strongly urge that the sale of Plum Island be constructed in such a way that the currently undeveloped portions of the island remain so and are permanently preserved, consistent with Plum Island's designation as the core of a Long Island Sound Stewardship Area.

We thank you for consideration of these comments. Should you need any additional information please do not hesitate to contact me at 631-323-8060.

Sincerely,

A handwritten signature in cursive script, appearing to read "Carolyn Spilman".

Carolyn Spilman  
Long Island Bird Conservation Coordinator  
Audubon New York







91	Sanderling								5
92	Savannah Sparrow								4
93	Sharp-shinned Hawk	1	1						
94	Song Sparrow <sup>C</sup>	4	3	13	16	2	22	41	25
95	Spotted Sandpiper <sup>C</sup>				5			4	1
96	Surf Scoter	300	1	2		2			
97	Swamp Sparrow								5
98	Tree Swallow			1	20		5	8	1
99	Tufted Titmouse	1		1				1	1
100	Turkey Vulture <sup>P</sup>		2	2			2		1
101	White-eyed Vireo <sup>P</sup>			4	9		8	10	9
102	White-crowned Sparrow								1
103	White-throated Sparrow	12	5			10			46
104	White-winged Scoter	36	4			3			4
105	Willow Flycatcher			1				1	
106	Winter Wren								1
107	Yellow Warbler <sup>C, P</sup>			11	10		25	17	16
108	Yellow-rumped Warbler		6						139
	<b>TOTAL # Individuals</b>	<b>1120</b>	<b>443</b>	<b>662</b>	<b>786</b>	<b>585</b>	<b>2078</b>	<b>1278</b>	<b>1458</b>
	<b>TOTAL # Species</b>	<b>37</b>	<b>36</b>	<b>43</b>	<b>43</b>	<b>34</b>	<b>42</b>	<b>50</b>	<b>50</b>

<sup>C</sup> Confirmed Breeding

<sup>P</sup> Probable Breeding

**Conservation Strategies  
for the  
Orient Point to Plum Island Important Bird Area**

**June 2009**

**The Orient Point to Plum Island Conservation Committee**

## **Background**

In the fall of 2005, Audubon New York convened a group of natural resource professionals and stakeholders to identify strategies to help protect the Orient Point to Plum Island (OPPI) Important Bird Area (IBA). Audubon's IBA program is part of a global effort to identify sites that are critical for maintaining bird populations and to work towards their conservation. In addition to this area's significance to birds, the growing momentum behind the Long Island Sound Stewardship Act (Appendix A) made this site prime for a conservation planning effort.

The purpose of the project was to facilitate conservation of the area by involving different interest groups in the protection of the site, increase public awareness of the site's importance, and engage more people in conservation. This project also served as a model for educating and engaging the public in the Long Island Sound Stewardship Initiative, as well as for implementing stewardship actions at specific sites. The OPPI IBA conservation committee reconvened in the Fall 2007 and updated conservation strategies in Spring 2008. This report summarizes the work carried out over the past three years and is intended to help guide future efforts to protect this incredible natural resource. Audubon New York received a grant from the National Fish and Wildlife Foundation to support this work.



## **Introduction**

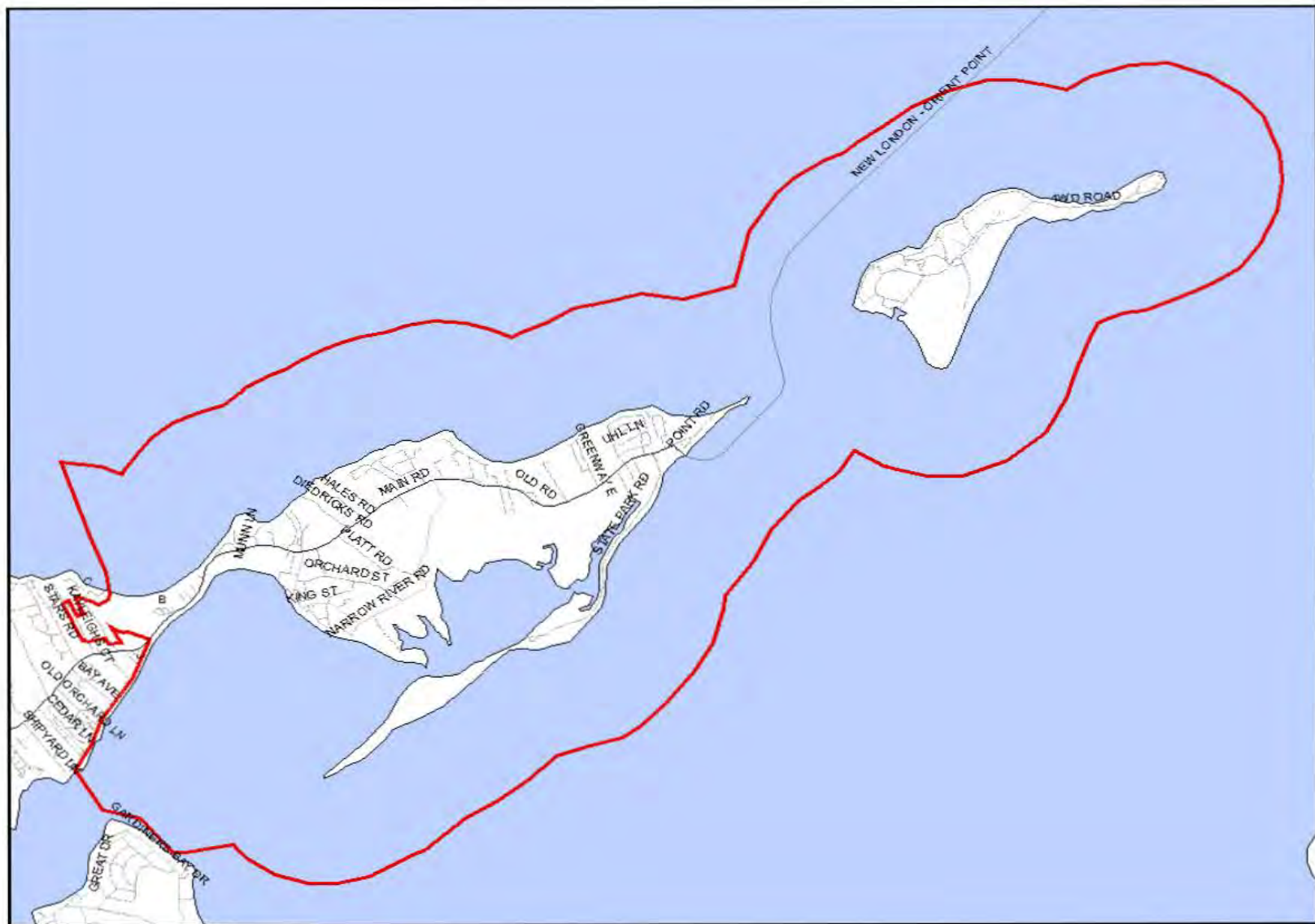
### ***Important Bird Area Program***

In the mid-1990s, Audubon New York's Important Bird Area (IBA) Program was initiated with the goal of identifying sites within the state that are most important to birds and to protect and promote proper management of those sites for the long-term conservation of birds, other wildlife, and their habitats. The New York IBA program was patterned after the efforts of BirdLife International that began in Europe and have since spread to many parts of the globe. As such, IBAs in New York are identified on the basis of criteria similar to those used throughout the world, which focus on threatened species, biome-restricted assemblages, and congregations of birds. With the oversight of a committee of ornithological experts from around the state and site nominations provided by individuals, Audubon chapters, bird clubs, and natural resource professionals, 136 IBAs have been identified in New York. This network of IBAs has provided a solid foundation to build conservation efforts aimed at protecting the full diversity of avian species in the state.

### ***Site Description and Significance to Birds***

The Orient Point to Plum Island IBA includes land and water on the North Fork of Long Island, extending from Orient Harbor in the east to Plum Island in the west and including Orient Beach State Park. Between Orient Point and Plum Island lies Plum Gut, a deep open water channel that links the waters of Gardiners Bay with the waters of eastern Long Island Sound (Figure 1). The habitats of particular significance to birds and other wildlife include barrier beaches, salt marshes, shallow bays, and maritime forests. Plum Island has a mixture of rocky shoreline, sand beaches, wetlands, and various upland shrub, grassland, and forest habitats.

This site met the IBA species at-risk criterion for number of breeding Piping Plover, Common Tern, and Least Tern. It also met the waterbird congregation criterion because of the number of Common and Roseate Terns courting and fishing in the area between Plum Island and Orient Point (Table 1). In addition, Ospreys nest and forage in the marshes and the area is an important waterfowl wintering area with substantial numbers of Canada Geese, American Black Ducks, Mallards, Canvasbacks, scaup, Long-tailed Ducks, scoters, Buffleheads, Common Goldeneyes, and Red-breasted Mergansers. Recently obtained data indicate that this site also meets the waterfowl congregation IBA criterion, which will be presented to the IBA technical committee during the next IBA site review process.



**Figure 1.** The Orient Point to Plum Island IBA outlined in red, Town of Southold, NY. Conservation Committee members agreed on this boundary for this process, although noted that the boundary omits areas further offshore where wintering waterfowl congregate.

**Table 1.** IBA Criteria met at the Orient Point to Plum Island IBA.

<i>Criterion</i>	<i>Species</i>	<i>Data</i>	<i>Season</i>	<i>Source</i>
Species at Risk	Piping Plover	1 pair in 2002, 1 in 2001, 7 in 1998, 6 in 1997, 9 in 1996, 5 in 1995, 8 in 1994, 5 in 1993	Breeding	NY Natural Heritage Biodiversity Databases
Species at Risk	Common Tern	At least 40 nesting pairs	Breeding	Mike Wasilco pers. comm. 2004
Species at Risk	Least Tern	27 pairs in 1998, 16 in 1997, 108 in 1996, 23 in 1995, 16 in 1994, 48 in 1993	Breeding	NY Natural Heritage Biodiversity Databases
Congregations-Waterbirds	Terns	300+ Common and Roseate Terns courting and fishing in the area between Plum Island and Orient Point	Breeding and migration	Mike Wasilco pers. comm. 2004

### ***Historical and Cultural Background***

Orient is the eastern-most hamlet in the town of Southold on Long Island's North Fork. It was originally named Poquatuck, after the name of the local native American tribe that resided along the inland waterways. It was later named Oyster Ponds due to the abundance of shellfish in the area. It is said that the name was then changed to Orient to match the name of its most prominent land feature, Orient Point. The hamlet was originally settled by five families given a land grant by the King of England in the 1600's, and their names King, Terry, and Latham still resonate to this day. Later, Orient was used as a base of operations by British commanders such as Benedict Arnold and local Tories during the American Revolution to conduct raids on Yankee-held Connecticut.

Orient's population was 662 at the 2000 census and increases to well over 1,000 in the summer months. Other than a post office, a gas station, and a few seasonal tourist stands, there is no center of commerce and residents depend on nearby Greenport for every-day necessities. Many make a living at the US Government's Department of Agriculture lab on nearby Plum Island, a 15 minute boat ride from Orient Point across Plum Gut, or at businesses further inland. There is also truck farming and commercial fishing industry.

Agriculture has played a key role in the history of Plum Island since Samuel Wyllys bought it from Chief Wyandanch, sachem of the Montauk Indian tribe, on April 27, 1659. Part of their agreement was that Wyllys would be able to pasture his cattle on the island free from interference. In 1897, the U.S. government acquired 130 acres on the island to construct harbor and coastal defense facilities. Two years later, the island became home to Fort Terry, and was used as a look out point throughout World War II.

In 1954 the U. S. Department of Agriculture acquired the island and established the modern-day Plum Island Animal Disease Center (PIADC), a high-security biocontainment facility, to research foreign animal diseases that impact livestock. In 2002 the PIADC facility was transferred from the U. S. Department of Agriculture to the U. S. Department of Homeland Security (Appendix B).

### ***Other Noteworthy Ecological features***

Several regionally rare plant species occur here, including Scotch loveage (*Ligusticum scothicum*), slender knotweed (*Polygonum tenue*), and sea-beach knotweed (*Polygonum glaucum*). A stand of blackjack oak (*Quercus marilandica*) represents the northernmost extent of the range of the species. Orient Harbor supports a significant bay scallop (*Aequipecten irradians*) commercial shellfishery and is an important spawning, nursery, and feeding area for a variety of fish. The offshore waters, especially of Plum gut, host large concentrations of striped bass (*Morone saxatilis*), bluefish (*Pomatomus saltatrix*), tautog (*Tautoga onitis*), summer flounder (*Paralichthys dentatus*), and others. Plum Gut is a major migration corridor for striped bass and Atlantic Salmon (*Salmo salar*).

The Christmas Bird Count that almost completely covers this site is one of the oldest counts in the United States and was started by the great naturalist, Roy Latham of Orient.

### ***Conservation Committee Members***

Participants in this process represented the U.S. Department of Homeland Security, U.S. Department of Agriculture, North Fork Audubon Society, Eastern Long Island Audubon Society, Audubon New York, Peconic Land Trust, Town of Southold, Suffolk County Parks, The Nature Conservancy, NYS Office of Parks, Recreation, and Historic Preservation, NYS Department of Environmental Conservation, U.S. Fish and Wildlife Service, and Cornell Cooperative Extension.

## **Conservation Strategies and Actions**

Conservation strategies for the OPPI IBA were developed using a modified version of The Nature Conservancy's Conservation by Design (<http://www.nature.org/aboutus/howwework/cbd/>) along with the Conservation Measures Partnership's Open Standards for the Practice of Conservation (<http://www.conservationmeasures.org>). A series of meetings were held with the conservation committee between September 2005 and March 2008. The purpose of these meetings was to identify and prioritize conservation targets, threats to those targets, and strategies to help address the threats. During the period of October 2008 to May 2009 the committee continued to meet to refine the conservation strategies, prioritize strategies based on need and opportunity, and begin implementation of selected conservation strategies within the IBA.

### ***Conservation Targets***

The Conservation Committee brainstormed priorities (conservation targets) to conserve and protect within the OPPI IBA. Initially the following targets were identified: Breeding and

feeding areas for beach nesting birds, including Piping Plover, Common Tern, Least Tern; Osprey; wintering waterfowl areas; old field habitat for wintering birds; saltmarsh habitat (focal species include Saltmarsh Sharp-tailed Sparrow and Seaside Sparrow); and maritime beach dune complex. The list was modified to five conservation targets to focus the effort.

### **Orient Point to Plum Island Conservation Targets**

- 1) Beach nesting birds and their habitats*
- 2) Wintering waterfowl*
- 3) Early successional habitat for breeding shrub birds*
- 4) Agricultural areas for wintering grassland birds*
- 5) Saltmarsh habitat*

The committee defined the conservation targets to identify the aspects of each target that, if missing or altered, would lead to the substantial loss of that target over time and its ability to persist in the long-term. This helped determine what was needed to measure and assess the status of each target. Definitions, measures, and knowledge needs for each of the five conservation targets are summarized in Table 2. The committee decided to gather information relative to the conservation targets before moving forward with identifying and prioritizing strategies (Appendix C).

**Table 2.** Definitions, measures, and knowledge needs of identified conservation targets for the Orient Point to Plum Island IBA.

<b>Conservation Target</b>	<b>Definition</b>	<b>Measure</b>	<b>Knowledge Needs</b>
<b><i>Beach nesting birds and their habitats</i></b> ( <i>Piping Plover, Common Tern, Least Tern, Roseate Tern, and Osprey</i> )	<ul style="list-style-type: none"> <li>• Necessary/essential breeding and migratory habitat: open, early successional habitat, sparse vegetation, distributed nesting habitat, platforms</li> <li>• Suitable habitat: beach use, and access to prey</li> <li>• Essential food: mud flats, fresh and salt water areas</li> </ul>	<ul style="list-style-type: none"> <li>• Breeding population size</li> <li>• Productivity</li> <li>• Breeding distribution</li> <li>• Migratory species and number of individuals</li> <li>• Length of migratory stay</li> <li>• Frequency of migration use</li> </ul>	<ul style="list-style-type: none"> <li>• Locations and number of nesting osprey, plovers, and terns.</li> <li>• Migratory counts and location/use of migratory habitats.</li> </ul>
<b><i>Wintering waterfowl</i></b> ( <i>American Black Duck, Canvasback, scaup spp., Long-tailed Duck, scoter spp., Bufflehead, Common Goldeneye, and Red-breasted Merganser</i> )	<ul style="list-style-type: none"> <li>• Suitable and essential habitat</li> <li>• Food</li> <li>• Shelter, lack of disturbance</li> <li>• Open areas</li> </ul>	<ul style="list-style-type: none"> <li>• Species and numbers of individuals</li> </ul>	<ul style="list-style-type: none"> <li>• Number of waterfowl.</li> </ul>



<b>Early successional habitat for breeding shrub birds</b> <i>(Northern Harrier, American Woodcock, Blue-winged Warbler, Prairie Warbler, Willow Flycatcher, Northern Bobwhite, American Kestrel, Eastern Kingbird, Horned Lark, Brown Thrasher, Eastern Towhee, Field Sparrow, Indigo Bunting, Savannah Sparrow)</i>	<ul style="list-style-type: none"> <li>• Size</li> <li>• Plant species composition and structure</li> <li>• Habitat distribution</li> <li>• Landscape context</li> </ul>	<ul style="list-style-type: none"> <li>• Acreage of habitat</li> <li>• Inventory of plant community</li> <li>• Number and richness of target bird species in breeding season</li> </ul>	<ul style="list-style-type: none"> <li>• What exists--are areas supporting breeding species</li> <li>• List of priority species we are targeting</li> <li>• Requirements of priority species</li> <li>• Amount, size and distribution of habitat</li> <li>• Farm inventory includes approx 55 tax parcels, this includes all types of agriculture</li> </ul>
<b>Agricultural areas for wintering grassland birds</b> <i>(Horned Lark, Savannah Sparrow, Snow Bunting, Others?)</i>	<ul style="list-style-type: none"> <li>• Size</li> <li>• Plant species composition and structure</li> <li>• Habitat distribution</li> <li>• Landscape context</li> </ul>	<ul style="list-style-type: none"> <li>• Acreage of habitat</li> <li>• Number and richness of target bird species in winter season</li> </ul>	<ul style="list-style-type: none"> <li>• Winter species use of fallow fields on private farms in Orient.</li> </ul>
<b>Saltmarsh habitat</b> <i>(Salt-marsh Sharp-tailed Sparrow, Seaside Sparrow)</i>	<ul style="list-style-type: none"> <li>• Nutrient level</li> <li>• Salinity</li> <li>• Ability to migrate</li> <li>• Size</li> </ul>	<ul style="list-style-type: none"> <li>• Plant indicators</li> <li>• Presence of bird species</li> <li>• Amount of shoreline that would not allow for migration (e.g. roads, hardened, etc.)</li> <li>• Sediment structure</li> </ul>	<ul style="list-style-type: none"> <li>• Amount of habitat.</li> <li>• Seasonal differences in habitat availability and species use.</li> </ul>

### **Threats to Conservation Targets**

The committee identified and discussed a number of threats to each target (Table 3). These threats were then ranked as high, medium, or low by individual committee members and then as a group. Factors determining whether a threat received a ranking of high, medium, or low included its scope (proportion of the target that can be expected to be affected by the threat), severity (level of expected damage to the target given the continuation of current circumstances and trends), and irreversibility (degree to which the effects of the threat can be reversed and the target restored if the threat no longer existed). This led to a prioritization of threats for each of the conservation targets (Table 4).

**Table 3.** Threats to the conservation targets for the Orient Point to Plum Island IBA.

Conservation Target	Threats
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<b><i>Beach nesting birds and their habitats</i></b>	<ul style="list-style-type: none"> <li>• Direct human-caused mortality (intentionally killing or destroying nests)</li> <li>• Existing development (residential, municipal, and commercial)</li> <li>• Future development (residential, municipal, and commercial, developmental pressures)</li> <li>• Climate change (unusual weather patterns, sea level rise)</li> <li>• Incompatible recreation (unleashed dogs, fireworks, ORVs)</li> <li>• Pollution (garbage, oil spills)</li> <li>• Predation (e.g. feral cats, raccoons)</li> <li>• Sea-level rise</li> <li>• Shoreline hardening (beach erosion and dredging)</li> <li>• Succession (short-term and long-term needs, source of this threat needs to be addressed but is a longer-term effort, there may be short-term actions that can address it)</li> <li>• Energy development (Wind turbines)</li> </ul>
<b><i>Wintering Waterfowl</i></b>	<ul style="list-style-type: none"> <li>• Brown tide cause (need to know more)</li> <li>• Incompatible recreation (boat disturbance and illegal hunting)</li> <li>• Large scale aquaculture (potential)</li> <li>• Pollution (oil spills)</li> <li>• Energy development (potential, preliminary stages, will have to do full EIS)</li> </ul>
<b><i>Early successional habitat for breeding shrub birds</i></b>	<ul style="list-style-type: none"> <li>• Atmospheric deposition</li> <li>• Climate change</li> <li>• Existing development</li> <li>• Farming practices</li> <li>• Fire suppression/exclusion</li> <li>• Future development</li> <li>• Invasive species</li> <li>• Motor-powered recreation</li> <li>• Habitat fragmentation (right of ways, roads, utility/power lines)</li> <li>• Succession</li> <li>• Deer (browsing, habitat/vegetation destruction)</li> </ul>
<b><i>Agricultural areas for wintering grassland birds</i></b>	<ul style="list-style-type: none"> <li>• Existing development</li> <li>• Farming practices</li> <li>• Future development</li> <li>• Invasive species</li> </ul>
<b><i>Saltmarsh habitat</i></b>	<ul style="list-style-type: none"> <li>• Existing development (septic systems, pesticides, lawn fertilizers, filling, lack of buffers)</li> <li>• Future development (septic systems, pesticides, lawn fertilizers, filling, lack of buffers)</li> <li>• Climate change (sea level rise)</li> <li>• Incompatible mosquito control</li> <li>• Incompatible recreation (wakes, jet skis, boaters)</li> <li>• Invasive species</li> <li>• Navigational dredging (cause marsh to slump, but not much happening within IBA)</li> <li>• Pollution (agricultural run-off, road run-off, residential)</li> <li>• Shoreline hardening</li> </ul>

**Table 4.** Priority threats to conservation targets for the Orient Point to Plum Island IBA.

<b><u>Beach nesting birds and their habitats</u></b> <ol style="list-style-type: none"><li>1. Predation (Orient Beach State Park, Plum Island)</li><li>2. Incompatible Recreation (Orient Beach State Park)</li><li>3. Future Development (Plum Island)</li></ol>
<b><u>Wintering waterfowl</u></b> <ol style="list-style-type: none"><li>1. Pollution</li><li>2. Incompatible Recreation</li></ol>
<b><u>Early successional habitat for breeding shrub birds</u></b> <ol style="list-style-type: none"><li>1. Habitat Fragmentation</li><li>2. Invasive Species</li></ol>
<b><u>Agricultural areas for wintering grassland birds</u></b> <ol style="list-style-type: none"><li>1. Future Development</li><li>2. Farming Practices</li></ol>
<b><u>Saltmarsh habitat</u></b> <ol style="list-style-type: none"><li>1. Invasive Species</li><li>2. Climate Change</li></ol>

### ***Strategies to Address Threats to Conservation Targets***

During the winter and spring of 2009, the committee met to brainstorm strategies to address threats to conservation targets, prioritize those strategies based on need and opportunity, and discuss involvement of the committee and member organizations in addressing the priority strategies. Based on the priority threats to conservation targets identified, the strategies prioritized by the committee for each of the conservation targets are listed below.

#### **Priority strategies for beach nesting birds and their habitats**

- Ensure the plover/tern sites at Orient Beach State Park and Plum Island are monitored regularly throughout the season effective April 1<sup>st</sup> each year.
- Reduce the threat of nest and chick predation for priority bird species through predator management.
- Selectively control documented predators at sites with high predation rates (removal of raccoons, gulls, etc.).
- Become involved in the potential transition of Plum Island—write a letter to USDA expressing interest in seeing it preserved, identify potential land protection partners who may be interested in acquisition, identify potential funds (e.g., EPF, LISSA) for acquisition. Work with the Town of Southold to ensure zoning of Plum Island protects critical habitats.

#### **Priority strategies for wintering waterfowl**

- Reduce the threat of nonpoint source pollution and solid waste to priority species and their habitats through policy and management.

#### Priority strategies for early successional habitat for breeding shrub birds

- Identify focus areas within the IBA for these habitats and species thru surveys being conducted and work to maintain them as productive habitat. This could be achieved through management and/or land protection via town zoning or working with land protection partners (such as Town/County/State/TNC/PLT) to preserve land and mitigate future development.

#### Priority strategies for agricultural areas for wintering grassland birds

- Identify focus areas within the IBA for these habitats and species thru surveys being conducted and work to maintain them as productive habitat. This could be achieved through management and/or land protection via town zoning or land protection partner.

#### Priority strategies for saltmarsh habitat

- Determine extent of habitat within IBA and conduct monitoring to detect presence/occurrence of target species.
- Reduce the threat of adverse habitat modification and altered plant community composition from increased prevalence of invasive species.
- Become aware of activities that other groups are doing at a larger scale to assess and address climate change and rising sea level and see if there are ways we can assist at the local scale (e.g., the Eastern States Alliance group work, Sea Level Rise Task Force; monitoring or other activities may be a part of those efforts).

#### ***Next Steps***

In the Spring of 2009, the committee met to determine capacity of member organizations to address priority conservation strategies as well as the committee's role moving forward. It was determined that the committee was already moving forward with addressing some of the priority strategies while other strategies were not feasible to address at this time. Current activities by the committee to address priority strategies include:

- Audubon New York and US FWS have been working with US DHS and NYS OPRHP to conduct regular weekly monitoring of beach-nesting bird activity throughout the breeding season at Orient Beach State Park and Plum Island beginning in April of 2009.
- Predator exclosures were used in the 2009 breeding season to protect Piping Plover nests at Orient Beach State Park and Plum Island.
- USDA trapped and removed raccoons from Plum Island in 2008.
- Audubon New York and North Fork Audubon have identified agricultural habitat for wintering grassland birds in Orient and have conducted a first round of bird surveys at these sites in Winter 2009.
- Audubon New York, US FWS, and The Nature Conservancy have identified saltmarsh habitat within the IBA. Site visits in June 2009 have confirmed use of saltmarsh habitat by Saltmarsh Sharp-tailed Sparrows.
- Audubon New York and North Fork Audubon continue to work with US DHS to conduct bird surveys on Plum Island.

In the case where the timing was not appropriate for the committee to address particular strategies, the group agreed to monitor the events and progress of other stakeholders in addressing these strategies. For example, the committee feels that it is important for us to be

involved in the potential transition of Plum Island. However, the closure of the facility on Plum Island has not yet been finalized and so there are not any actions for the committee at this time other than to monitor the situation so that we can become involved if the transition is announced.

### ***Conclusions***

The Orient Point to Plum Island IBA is a site of statewide significance because of the habitat it provides to birds, specifically breeding at-risk birds and congregations of terns and waterfowl. To facilitate conservation and increase awareness of the site's significance, a group of interested individuals from a variety of organizations participated in a series of meetings to develop this conservation action plan. Although this report summarizes the work carried out to date, the strategies and actions outlined in this report will require long-term commitment on behalf of those who have been involved in this effort and could involve other conservation partners.



## **Appendix A**

### **Long Island Sound Stewardship Act**

The Long Island Stewardship Act was passed by the House on Sept. 18, 2006 and the Senate on Sept. 20, 2006 and the president signed the bill on October 16, 2006. The measure would authorize up to \$25 million annually through 2011 to preserve and improve open spaces and important ecological sites around the Sound, as well as to provide additional access to this nationally significant estuary. Thirty-three initial priority sites have been identified by the LIS Study Policy Committee, including Plum Island. Orient Point has not been identified in this list, but is within the Peconic Estuary, which would make it eligible for funding under the Act.

The bill was amended several times since its introduction to both houses in June 2004. One of the amendments in 2005 added the Peconic Estuary as part of the larger Long Island Sound region. This would allow for grants from this bill to be used in furtherance of the Peconic CCMP which was issued in 2001. Other changes reduced the authorized funding level from \$40 million annually to \$25 million, and the federal to local match from 75%-25% to 60%-40%. The sunset term was reduced from Dec. 31, 2013 to Dec. 31, 2011. There were many other small changes and some more troubling amendments, including the definition of a qualified applicant. Hopefully, many of the concerns will be resolved when the guidelines and criteria are established pursuant to the terms of the bill.

## **Appendix B**

### **Relevant reports and other sources of information**

Orient, New York. (2006, November 19). In *Wikipedia, The Free Encyclopedia*. Retrieved 20:00, December 19, 2006, from [http://en.wikipedia.org/w/index.php?title=Orient%2C\\_New\\_York&oldid=88743524](http://en.wikipedia.org/w/index.php?title=Orient%2C_New_York&oldid=88743524)

An Island Fortress for Biosecurity. USDW Research and the Plum Island Animal Disease Center. Retrieved 16:50, December 19, 2006, from <http://www.ars.usda.gov/plum/forum1295.htm>

## Appendix C

### Resources for addressing identified knowledge needs related to conservation targets for the OPPI IBA.

Target	Knowledge Needs	Resources
<b>1) Beach-nesting birds and their habitats.</b>	Locations and number of nesting osprey, plovers, and terns.	LICWS data (1994 – 2007) for Orient Beach State Park and Plum Island. NYS Natural Heritage Program data. NFAS Osprey Census data and nest stand locations (2006 and 2007). NYS DEC Osprey surveys.
	Migratory species counts and location/use of migratory habitats.	Plum Island surveys.  eBird
<b>2) Wintering waterfowl.</b>	Number of waterfowl.	eBird Plum Island surveys (1/25/07, 3/5/07, 11/27/07). CBC surveys (1994 – 2006).
<b>3) Early successional habitat for breeding shrub birds.</b>	What exists? Are areas supporting breeding species?	Plum Island surveys (6/27/07, 7/13/07, 6/19/08, 7/5/08). Breeding Bird Surveys (beginning Spring 2009)? eBird Habitat map using orthophotos, PEP and Southold Town land cover GIS data.
	List of priority species we are targeting.	NYS and federally listed species. Audubon WatchList 2007. Partners in Flight assessment of species of concern/stewardship 2005. NYS Breeding Bird Atlas.
	Requirements of priority species.	Literature review. Audubon New York Science office.
	Amount, size, and distribution of habitat.	Habitat map using orthophotos, PEP and Southold Town land cover GIS data.
	Farm inventory includes approx 55 tax parcels, this includes all types of agriculture.	Habitat map using orthophotos, PEP and Southold Town land cover GIS data.
<b>4) Agricultural areas for wintering grassland birds.</b>	Winter species use of fallow fields on private farms in Orient.	eBird Winter Surveys (beginning Winter 2008 – 2009)? CBC surveys (1994 – 2006).

<b>5) Saltmarsh habitat.</b>	Amount of habitat.	Habitat map using orthophotos, PEP and Southold Town land cover GIS data.
	Seasonal differences in habitat availability and species use.	eBird Habitat map using orthophotos, PEP and Southold Town land cover GIS data.

# SUFFOLK COUNTY LEGISLATURE



**EDWARD P. ROMAINÉ**  
LEGISLATOR 1ST DISTRICT

June 10, 2010

Phil Youngberg  
c/o John Dugan  
General Services Administration  
10 Causeway Street  
Room 925  
Boston, MA 02222

Dear Mr. Youngberg

I am writing to provide comment on the proposed sale of the 840-acre Plum Island and the 9 ½-acre Orient Point facility.

The federal government had decided to upgrade its animal disease research center from a Bio-Safety Level 3 laboratory to a Level 4. While the center will be relocated from Plum Island to Manhattan, Kansas, no funds have been allocated for the construction of this new facility. There is also no timeframe for decommissioning Plum Island. I question the purpose and timing of the two public scoping sessions held on the sale. In my opinion, the process is premature.

Before discussing the sale of Plum Island, GSA and the Department of Homeland Security should be proposing a plan for remediation of any and all contaminants on the island. Since 1954, the Department of Agriculture, and more recently the Department of Homeland Security, has studied highly contagious diseases on Plum Island. A complete, independent environment survey needs to be undertaken and uncompromised remediation plan developed. The sale of this property should not be discussed until any and all environmental issues are remediated.

As a federal property, Plum Island is now exempt from local land use requirements. Once the property is sold to private owners, Southold Town land use and zoning codes would apply. It is my understanding that the GSA has not had any discussion with the town regarding planning, zoning or site plan issues. How can GSA offer Plum Island for sale without providing potential buyers with information about permissible land uses?

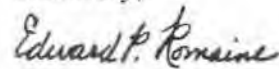


Recently, the federal government spent almost \$50 million in upgrading the facilities on Plum Island. Is there a plan for the fixed assets on the island? Will any of the existing structures be demolished or gutted? What buildings will remain? Are any of the fixed assets critical to national security? Will those that are be removed or destroyed? Can any of the fixed assets be reused at the planned Kansas facility? What is the cost of the preparing the island for sale? Will the GSA establish pre-qualifications for potential buyers of this sensitive facility?

I find it odd that the federal government, given its investment in the property and the timely and costly remediation process, has not considered a "no action" option. This would allow Plum Island to remain in federal hands and hopefully be used by other federal agencies or remain as a nature preserve.

At this time there are too many unanswered questions, most of which are critical to the future of the island and Southold Town. I urge the federal government to reconsider the sale of Plum Island until all questions are thoroughly answered.

Sincerely,



Edward P. Romaine

Suffolk County Legislator, First District

CC: Senator Charles Schumer  
Senator Kristin Gillibrand  
Congressman Timothy Bishop  
Southold Supervisor Scott Russell

EPR: kmo

## Haywood, Paul

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**From:** Bourdeau, Jonathan  
**Sent:** Monday, June 14, 2010 12:00 PM  
**To:** Haywood, Paul  
**Subject:** FW: Plum Island/Renewable Energy

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**From:** Jenkins, Josh  
**Sent:** Monday, June 14, 2010 11:52 AM  
**To:** Bourdeau, Jonathan  
**Subject:** FW: Plum Island/Renewable Energy

**Josh Jenkins**  
**770.421.3412**

---

**From:** john.dugan@gsa.gov [mailto:john.dugan@gsa.gov]  
**Sent:** Monday, June 14, 2010 11:37 AM  
**To:** Jenkins, Josh  
**Cc:** Stelmack, Mark; phil.youngberg@gsa.gov  
**Subject:** Fw: Plum Island/Renewable Energy

FYI

---

John L. Dugan  
Real Property Utilization & Disposal Division  
U.S. General Services Administration  
10 Causeway Street, Room 925  
Boston, MA 02222  
Office: 617.565.5709  
Cell: 617.921.0431  
Fax: 617.565.5720

----- Forwarded by John L. Dugan/1P/R01/GSA/GOV on 06/14/2010 11:36 AM -----

**Renee M. Miscione/2P/R02/GSA/GOV**

06/14/2010 11:31 AM

To Philip B. Youngberg/4P/R04/GSA/GOV@GSA, John L.  
Dugan/1P/R01/GSA/GOV@GSA  
cc [jmk\\_07628@yahoo.com](mailto:jmk_07628@yahoo.com), Paula M. Santangelo/1P/R01/GSA/GOV@GSA  
Subject Fw: Plum Island/Renewable Energy

FYI...Please see the email below that I received. I will send a polite response to acknowledge receipt and let Mr. Rubino know that his suggestion has been forwarded.

Renee

Renee M. Miscione  
Public Affairs Officer  
GSA Northeast and Caribbean Region

26 Federal Plaza  
New York, NY 10278  
212.264.8260  
347.675.3581 (c)  
[renee.miscione@gsa.gov](mailto:renee.miscione@gsa.gov)

----- Forwarded by Renee M. Miscione/2P/R02/GSA/GOV on 06/14/2010 11:24 AM -----

Ken Rubino <[kenlovelanefoto@aol.com](mailto:kenlovelanefoto@aol.com)>

To [renee.miscione@gsa.gov](mailto:renee.miscione@gsa.gov)

cc

Subject Plum Island/Renewable Energy

06/13/2010 09:19 AM

Good Morning,

Please pass this along to whomever you think might be interested.

As the plan for the sale of Plum Island is being developed, we at the North Fork Environmental Council (NFEC) would like to offer a suggestion for its future use. The NFEC is located in Mattituck, which is a hamlet within the township of Southold, N.Y.

Given our location, we're extremely familiar with the island as some of our board members have toured the island and many of the island's employees live in our town. The NFEC has a long-held opinion that the island, if it is deemed surplus to current use, should be developed as a renewable energy site. Given the island's infamous tidal currents in the Plum Gut area, a tidal turbine system, along with solar and wind generated electricity, would seem to be an ideal solution to growing energy concerns.

As the unfortunate Gulf coast oil tragedy continues to unfold, our nation's interest in renewable energy development should be of paramount importance. Certainly as the island is home to many species of endangered birds, any renewable energy project would need to work cooperatively to protect them from harm. The NFEC further believes that there are other additional uses which could be compatible with a renewable energy project and is not suggesting that Plum Island have a singular use as it currently operates under. Thank you for your time.

Respectfully,

Ken Rubino

President, North Fork Environmental Council



## United States Department of the Interior

### FISH AND WILDLIFE SERVICE

3817 Luker Road  
Cortland, NY 13045



June 16, 2010

Mr. Phil Youngberg  
Environmental Manager  
c/o John Dugan  
General Services Administration  
10 Causeway Street, Room 925  
Boston, MA 02222

Dear Mr. Youngberg:

This is in reference to the General Services Administration's (GSA) Notice of Intent (NOI) to prepare an Environmental Impact Statement (EIS) for the sale of Plum Island, New York (NY), and an ancillary facility at Orient Point, NY, published in *Federal Register* (FR) Vol. 75, No. 52 on Thursday, March 18, 2010, pursuant to the requirements of the National Environmental Policy Act (NEPA) of 1969, and the President's Council on Environmental Quality Regulations (40 CFR 1500-1508). As noted in the FR, the U.S. Department of Homeland Security (DHS) will act as a Joint Lead Agency in ongoing consultation with the GSA for the NEPA and associated regulatory compliance activities.

The U.S. Fish and Wildlife Service (Service) is providing these comments for your use in preparing the Draft Environmental Impact Statement (DEIS) for this major Federal action. Due to the rich environmental resources present on and around Plum Island, including threatened and endangered species for which the Service has special expertise and authority in the protection and conservation of under provisions of the Endangered Species Act of 1973, as amended (87 Stat. 884, as amended; 16 U.S.C. 1531 *et seq.*), and the Migratory Bird Treaty Act of 1918, as amended (40 Stat. 755, as amended; 16 U.S.C. 703-712), we would welcome the opportunity to serve as a cooperating agency during the EIS process.

Overall, the Service believes that the GSA should undertake a detailed analysis of the impacts of its proposed action on the significant fish and wildlife resources and habitats that are found on and adjacent to Plum Island, including but not limited to, the Federally-listed as threatened piping plover (*Charadrius melodus*) and the endangered roseate tern (*Sterna dougallii dougallii*), migratory bird species, bats, amphibians, wetlands, and upland maritime and hardwood forests, as well as grassland habitats. We also recommend that the GSA consider evaluating additional alternatives to the sale of Plum Island in the DEIS, including an alternative that incorporates public ownership and access and allows passive recreational uses, such as walking trails, wildlife watching, photography, and educational trips.

We understand that the Environmental Protection Agency's (EPA) Regions I and II have provided comments on the proposed action in a letter to the GSA dated June 2, 2010, stressing the ecological and recreational value of Plum Island as the driving force for nominating it as one of thirty-three Long Island Sound Stewardship Areas. We recognize and support their role as administrators of the Long Island Sound and Peconic Bay National Estuary Programs and believe their input and recommendations during the public and agency scoping period should be given serious consideration.

### Location

Plum Island is an 840-acre island located about 12 miles southwest of New London, Connecticut, and 1.5 miles from the northeastern tip of Long Island, NY. It is located at the eastern end of Long Island Sound and is bounded on its southern shore by the Peconic Bay, both of which are designated as National Estuaries by the EPA. It is also located in the Atlantic Coast Flyway, a corridor along the eastern North American through which millions of birds migrate twice a year to their breeding and wintering grounds to points north and south. Both Plum Gut and The Race serve as major migratory pathways for various finfish species.

### Environmental Resources

Plum Island has been manipulated by man for hundreds of years, culminating in development and infrastructure that supports its current use as the Plum Island Animal Disease Center. However, the majority of the 843-acre Plum Island, with its more than seven miles of coastline, is undeveloped and still contains regionally-significant coastal, upland, wetland, and nearshore habitats. It is surrounded by the extremely productive estuarine/marine waters of Long Island Sound, Plum Gut, Block Island Sound, and Gardiners Bay.

Over the last three seasons from 2007 to 2010, the Service has observed that the nearshore zone provides winter habitat for harbor seals (*Phoca vitulina*) and gray seals (*Halichoerus grypus*). Harbor seals are known to haul-out (leave the water) on the southeastern shoreline of Plum Island for resting and sunning. Other marine mammals that are known to occur in waters off Plum Island include the finback whale (*Balaenoptera physalus*), minke whale (*B. acutorostrata*), and humpback whale (*Megaptera novaeangliae*), as well as the common dolphin (*Delphinus delphis*), bottlenose dolphin (*Tursiops truncatus*), white-sided dolphin (*Lagenorhynchus acutus*), striped dolphin (*Stenella coerulealba*), and pilot whale (*Globicephala melaena*) as discussed in Edinger *et al.* (2002).

Limited surveys in various habitat types around the island by the North Fork Audubon Society chapter have resulted in observation of 80 species of migratory birds, comprised of bay ducks, sea ducks, shorebirds, songbirds, and raptors. The southern shores contain sandy beach backed by low-lying dunes that transition to grassland and shrubland. It is in this sandy beach habitat that the Federally-listed piping plover has been observed breeding, based on surveys conducted by the Service and the New York State Department of Environmental Conservation with assistance from Audubon NY over the last several years. Although not well documented, it is suspected that Plum Island is an important migratory stopover area for this species as it migrates from its southern wintering grounds into New England and the Atlantic Canadian Maritime



Provinces. The presence of a piping plover nest was confirmed on Plum Island in 2002, with subsequent nesting occurring in 2009 and 2010. This same habitat consistently supports several pairs of American oystercatchers (*Haematopus palliatus*), a species of high conservation concern.

The surrounding waters provide significant foraging habitat for roseate terns that breed at nearby Great Gull Island, which itself supports the largest breeding colony of roseate terns and New York State-listed common terns (*Sterna hirundo*) in New York. Due to the presence of the listed species noted above, we anticipate that the GSA and DHS will initiate consultation pursuant to the ESA regarding the potential impacts the proposed action may have on these listed species.

Habitat type as a percentage of total land cover on Plum Island is given below (from Department of Homeland Security 2008), but detailed surveys of the flora and fauna of these broad community types are lacking. As a result, evaluation of the potential impacts of the proposed action and any additional alternatives that may be considered would be difficult to undertake. In fact, some of these designations, such as "Barren land," may not be accurate descriptors of existing conditions further complicating the alternative analysis in the DEIS. For instance, "Barren land" includes the southern shoreline of Plum Island, but the Service identifies this as coastal beach and dune habitat, which supports the Federally-listed piping plover, as well as the American oystercatcher. Therefore, to adequately plan and evaluate any proposed alternative detailed biological surveys should be undertaken and the results made available in the DEIS. The GSA should coordinate with the Service on survey methodologies, as well as timing and duration of the studies.

- Deciduous forest 35%
- Barren land 17%
- Grassland 15%
- Herbaceous wetland 14%
- Woody wetland 12%
- Scrub land 5%
- Open water 2% (National Land Cover Dataset 2001, as referenced in the Department of Homeland Security 2008)

In undertaking its analysis of potential impacts of the proposed action, GSA should recognize that Federal, State, and local agencies, as well as private organizations, have highlighted the ecological significance Plum Island and the surrounding areas to the region through the following designations:

Orient Point - Islands Complex Significant Fish and Wildlife Habitat (U.S. Fish and Wildlife Service 1991);

Audubon NY's Orient Point and Plum Island Complex Important Bird Area (Burger and Liner 2005);

Long Island Sound (LIS) National Estuary Program "Plum, Little, and Great Gull Islands Stewardship Area"; and

Plum Gut Significant Coastal Fish and Wildlife Habitat (New York State Department of State Division of Coastal Resources 2005).

The Orient Point - Islands Significant Coastal Habitat Complex identified by the Service underscores its high value for nesting colonies of piping plover and least tern (*Sterna antillarum*) and colonial wading bird rookeries of black-crowned night-heron (*Nycticorax nycticorax*) and great egret (*Casmerodius albus*). Beaches and sand ridges in the Orient Point area contain populations of at least three regionally-rare plant species and historical records for several others: Scotch lovage (*Ligusticum scoticum*), slender knotweed (*Polygonum tenue*), and seabeach knotweed (*Polygonum glaucum*). The latter is also found on Plum Island. Of special significance in this same area are stands of an unusual type of maritime red cedar (*Juniperus virginiana*) forest in which the individual trees are low-growing (3-6 feet in height) and circular in form, many of which are quite old.

The shallow waters are especially significant as wintering waterfowl concentration areas. These waters contain substantial winter populations of scoter (*Melanitta* spp.), greater and lesser scaup (*Aythya marila* and *A. affinis*), American black duck (*Anas rubripes*), common goldeneye (*Bucephala clangula*), bufflehead (*Bucephala albeola*), red-breasted merganser (*Mergus serrator*), long-tailed duck (*Clangula hyemalis*), canvasback (*Aythya valisineria*), mallard (*Anas platyrhynchos*), and Canada goose (*Branta canadensis*). Osprey (*Pandion haliaetus*) nest and feed in the marshes on Plum Island.

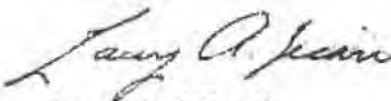
Recent studies indicate that the waters of Gardiners Bay, the Peconic Bays, and other bodies of water in this general area may serve as important summer feeding and nursery areas for juvenile Kemp's ridley sea turtles (*Lepidochelys kempii*), one of the rarest sea turtles and a Federally-listed endangered species, and for other Federally-protected sea turtle species. These waters are also important feeding areas for common and roseate terns breeding on Great Gull Island. The deep turbulent waters and shallow shoals of Plum Gut (the area of open water between Plum Island and Orient Point) provide significant and diverse habitat for marine fishes of special emphasis in the region, including large concentrations of striped bass (*Morone saxatilis*), bluefish (*Pomatomus saltatrix*), tautog (*Tautoga onitis*), summer flounder (*Paralichthys dentatus*), and scup (*Stenotomus chrysops*), and are regionally important recreational fishing areas. Plum Gut is one of two primary migration corridors for striped bass as they move into Long Island Sound in spring to their breeding grounds and return to southern wintering areas during the fall. Plum Gut is thought to be the major migration corridor for Atlantic salmon (*Salmo salar*) returning to the Connecticut and Pawcatuck Rivers in the early spring.

Finally, the Service's Long island National Wildlife Refuge Complex (Complex) includes ten management units across Long Island, with Wertheim National Wildlife Refuge as its headquarters. The Complex was established to conserve, manage, and where appropriate, restore

wildlife and plant species and their habitats for the benefit of present and future Americans. Biological management focuses on migratory birds and the conservation of threatened and endangered species. The Complex recently acquired Gardiner's Point Island and is in the process of managing it to encourage least and roseate tern nesting at the site. Gardiner's Point Island sits southeast of Plum Island and north of Gardiners Island. All the islands in the area, including Plum Island, have tremendous wildlife and wildlife habitat potential.

Thank you for the opportunity to provide comments during this scoping period. If you have any questions or require further assistance, please have your staff contact Steve Papa of the Long Island Field Office at (631) 776-1401.

Sincerely,

  
David A. Stilwell  
Field Supervisor

#### References

Burger, M.F. and J.M. Liner. 2005. *Important Bird Areas of New York*. Audubon New York, NY.

Department of Homeland Security. 2008. National Bio and Agro-Defense Facility – Final Environmental Impact Statement. Vol. II, Appendices A-H.

Edinger, G.J., D.J. Evans, S. Gebauer, T.G. Howard, D.M. Hunt, and A.M. Olivero (editors). 2002. *Ecological Communities of New York State*. Second Edition: A revised and expanded edition of Carol Reschke's *Ecological Communities of New York State*. (Draft for review). New York Natural Heritage Program, New York State Department of Environmental Conservation, Albany, NY.

New York State Department of State Division of Coastal Resources. 2005.  
[http://www.nyswaterfronts.com/waterfront\\_natural\\_narratives.asp](http://www.nyswaterfronts.com/waterfront_natural_narratives.asp).

U.S. Fish and Wildlife Service. 1991. Northeast Coastal Areas Study: Significant Coastal Habitats of Southern New England and Portions of Long Island, NY.

cc: FWS, Stamford, CT (L. Harrison)  
FWS, Charlestown, RI (S. Marino)  
FWS, LINWRC, Shirley, NY (M. Williams)





STATE OF CONNECTICUT  
DEPARTMENT OF ENVIRONMENTAL PROTECTION



March 31, 2010

Mr. James Biederman, Esq., Program Expert  
Public Buildings Service  
Real Property Disposal Division (9PRF-10)  
400 15th St., SW  
Auburn, WA 98001

Re: Sale of Plum Island, New York

Dear Mr. Biederman,

It has come to the attention of this Office that the General Services Administration (GSA) is considering the possible sale of Plum Island, New York for redevelopment or other purposes following the intended relocation of the animal disease research facilities presently operated there. While Plum Island is located within the New York segment of Long Island Sound, its proximity to Connecticut state waters and its existing maritime connection to Connecticut shoreline communities demonstrate its influence on this state's coastal zone. Consequently, I would like to take this opportunity to affirm that if and when the GSA elects to proceed with such a sale, it shall be considered by this Office to be a Federal activity subject to Federal consistency review under Section 307(c)(1) of the Coastal Zone Management Act of 1972, as amended, Subpart C of 15 Code of Federal Regulations (CFR) Part 930, and Section II, Part VII(c) of the State of Connecticut Coastal Management Program and Final Environmental Impact Statement.

Specifically, in accordance with the Federal consistency regulations, GSA must prepare and submit to this Office a Federal Consistency Determination identifying reasonably foreseeable direct and/or indirect effects on Connecticut's coastal resources and uses. Connecticut's designated coastal resources and uses are enumerated in the Connecticut Coastal Management Act at <http://www.cga.ct.gov/2005/pub/Chap444.htm> and in the enclosed Reference Guide to Coastal Policies and Definitions. The following link will direct you to Connecticut's Federal consistency application form and instructions [http://www.ct.gov/dep/cwp/view.asp?a=2705&q=441852&depNav\\_GID=1622](http://www.ct.gov/dep/cwp/view.asp?a=2705&q=441852&depNav_GID=1622).

As you consider future actions at Plum Island as they may affect Connecticut's coastal zone, please contact Tom Ouellette of this Office at 860-424-3612 or [tom.ouellette@ct.gov](mailto:tom.ouellette@ct.gov) if you have any questions about Connecticut's Federal consistency review procedures. Thank you.

Sincerely,

Brian P. Thompson, Director  
Office of Long Island Sound Programs

Encl.

cc: Betsey C. Wingfield, CT DEP  
Allison Castellan, NOAA/OCRM

# Stockbridge-Munsee Tribal Historic Preservation Office

Sherry White - Tribal Historic Preservation Officer  
W13447 Camp 14 Road  
P.O. Box 70  
Bowler, WI 54416

TCNS# \_\_\_\_\_  
PROJECT # Sale of Plum Island  
COMPANY NAME GSA

Date 04-06-10

## ADDITIONAL INFORMATION NEEDED

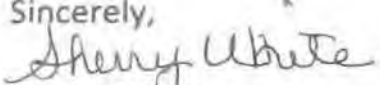
- ☐ Site visit by Tribal Historic Preservation Officer  
☐ Archeological survey, phase 1  
☐ Literature/record search including colored maps  
☐ Pictures of site  
☐ SHPO report  
☐ Project does not appear to endanger archaeological sites of interest to the Stockbridge-Munsee Tribe.  
☒ Out of area

Has site been previously disturbed? \_\_\_\_\_  
Yes No

If yes, to what extent and when? \_\_\_\_\_  
\_\_\_\_\_

Will the proposed action adversely affect properties listed, or eligible for, listing on the National Register of Historic Places? (buildings, archaeological sites; objects of significance to a Tribe including graves, funerary objects, and traditional cultural properties) \_\_\_\_\_  
Yes No

Should this project inadvertently uncover a Native American site, even after an archaeological survey or if there is a change to the project, we ask that you halt all construction and notify the Stockbridge-Munsee Tribe immediately.

Sincerely,  
  
Sherry White  
Tribal Historic Preservation Officer





UNITED STATES DEPARTMENT OF COMMERCE  
National Oceanic and Atmospheric Administration  
NATIONAL MARINE FISHERIES SERVICE  
NORTHEAST REGION  
55 Great Republic Drive  
Gloucester, MA 01930-2270

APR 12 2010

Phil Youngberg  
Environmental Manager  
c/o John Dugan  
US General Services Administration  
Thomas P. O'Neill, Jr. Federal Building  
10 Causeway Street, Room 295  
Boston, Massachusetts 02222

Re: Sale of Plum Island, Orient Point, NY

Dear Mr. Youngberg,

This is in response to your letter dated March 30, 2010 regarding the US General Service's Administration's preparation of an Environmental Impact Statement (EIS) for the proposed competitive public sale of Plum Island, New York as well as ancillary support facility at Orient Point, New York. Plum Island is an 840-acre island off the North Fork of Long Island. Your letter requested comments on the proposed action or the alternatives that will be considered in an EIS that is being prepared for the action. The EIS will address the potential impacts to the environment of two alternatives: sale of the property (the "action alternative") and continued Federal ownership. The action alternative will be further refined into a series of reasonably foreseeable land use options.

Several species listed by NOAA's National Marine Fisheries Service (NMFS) under the Endangered Species Act (ESA) of 1973, as amended, occur seasonally in the waters surrounding Plum Island. Without more information on the potential uses of the property it is difficult to predict what effects the sale of the property may have on these species. Information on these listed species as well as marine mammals and candidate species is provided below.

#### *Listed Species*

Listed sea turtles are also found seasonally in the waters off of New York with the most abundant being the federally threatened loggerhead (*Caretta caretta*) followed by the federally endangered Kemp's ridley (*Lepidochelys kempi*). Federally endangered leatherback (*Dermochelys coriacea*) and green (*Chelonia mydas*) sea turtles also occur seasonally in New York waters. These species are known to occur in Long Island Sound in the vicinity of Plum Island, typically between May and November.

Federally endangered Northern right whales (*Eubalaena glacialis*) and humpback whales (*Megaptera novaeangliae*) are found seasonally in the waters off of New York. Fin whales



(*Balaenoptera physalus*) may also be present near the project site. Sei (*Balaenoptera borealis*) and Sperm (*Physter macrocephalus*) whales are also seasonally present off the coast of New York but are typically found in deeper offshore waters. Large whales are rare visitors to Long Island Sound and are more often found in the waters of the Atlantic Ocean off the southern coast of Long Island.

#### *Technical Assistance for Candidate Species*

Candidate species are those petitioned species that are actively being considered for listing as endangered or threatened under the ESA, as well as those species for which NMFS has initiated an ESA status review that it has announced in the *Federal Register*.

Atlantic sturgeon (*Acipenser oxyrinchus oxyrinchus*) occur in the Hudson River as well as in the coastal waters of New York, including the East River and Long Island Sound. In 2006, NMFS initiated a status review for Atlantic sturgeon to determine if listing as threatened or endangered under the ESA is warranted. The Status Review Report was published on February 23, 2007. NMFS is currently considering the information presented in the Status Review Report to determine if any listing action pursuant to the ESA is warranted at this time. If it is determined that listing is warranted, a final rule listing the species could be published within a year from the date of publication of the proposed rule. Currently, NMFS expects to publish a finding as to whether any listing action is appropriate by the Fall of 2010. As a candidate species, Atlantic sturgeon receive no substantive or procedural protection under the ESA; however, NMFS recommends that project proponents consider implementing conservation actions to limit the potential for adverse effects on Atlantic sturgeon from any proposed project. Please note that once a species is proposed for listing the conference provisions of the ESA apply (see 50 CFR 402.10). As the listing status for this species may change, NMFS recommends that GSA obtain updated status information from NMFS prior to the completion of the EIS.

#### *Marine Mammals*

Several species of marine mammals are common residents or occasional visitors to the waters off of New York including gray seals, harbor seals, and harbor porpoise. All marine mammals receive protection under the Marine Mammal Protection Act (MMPA) of 1972, as amended. The MMPA prohibits, with certain exceptions, the take of marine mammals in U.S. waters and by U.S. citizens on the high seas, and the importation of marine mammals and marine mammal products into the U.S. NMFS may issue permits under MMPA Section 104 (16 U.S.C. 1374) to persons that authorize the taking of specific species of marine mammals. Several marine mammals are likely to occur in the project area. The potential for effects to marine mammals depends on the proposed use of the property. Additional information regarding the MMPA permitting process may be obtained from NMFS' Office of Protected Resources Permits, Conservation, & Education Division (301-713-2289). Information on the MMPA permitting process can also be found online at: <https://apps.nmfs.noaa.gov/questionnaire/questionnaire.cfm>.

#### *Section 7 Consultation*

As noted above, without additional information on the proposed use of the property it is difficult to determine how the sale of the property may affect fish populations, marine mammals and sea turtles. Under Section 7(a)(2) of the ESA, each Federal agency is required to insure that any

action they authorize, fund or carry out is not likely to jeopardize the continued existence of any endangered or threatened species. If GSA determines that the proposed sale may affect listed species, a section 7 consultation would be necessary.

Should you have any questions regarding these comments or about the section 7 process, please contact Julie Crocker of my staff at (978)282-8480 or [Julie.Crocker@Noaa.gov](mailto:Julie.Crocker@Noaa.gov).

Sincerely,



Mary A. Colligan  
Assistant Regional Administrator  
for Protected Resources

CC: Rusanowsky, F/NER4

EC: Crocker, F/NER3

## Haywood, Paul

---

**From:** Jenkins, Josh  
**Sent:** Monday, April 26, 2010 3:41 PM  
**To:** Bourdeau, Jonathan  
**Cc:** Bales, Nancy  
**Subject:** FW: "Enviro Impact Statement for the Sale of Plum Island"

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**From:** phil.youngberg@gsa.gov [mailto:phil.youngberg@gsa.gov]  
**Sent:** Monday, April 26, 2010 3:32 PM  
**To:** john.kelly@gsa.gov; john.dugan@gsa.gov; Stelmack, Mark; Jenkins, Josh  
**Cc:** carol.chirico@gsa.gov  
**Subject:** Fw: "Enviro Impact Statement for the Sale of Plum Island"

----- Forwarded by Philip B. Youngberg/4P/R04/GSA/GOV on 04/26/2010 03:25 PM -----

Philip B. Youngberg/4P/R04/GSA/GOV

04/26/2010 03:24 PM

To "Jason Ross" <[JRoss@delawarenation.com](mailto:JRoss@delawarenation.com)>@GSAEXTERNAL  
cc  
Subject Re: "Enviro Impact Statement for the Sale of Plum Island" [Link](#)

Thank you. I will have the appropriate people at GSA contact you.

Phil Youngberg  
404-562-0787 office  
404-433-8393 cell

"Jason Ross" <[JRoss@delawarenation.com](mailto:JRoss@delawarenation.com)>

04/26/2010 03:05 PM

To <[phil.youngberg@gsa.gov](mailto:phil.youngberg@gsa.gov)>  
cc  
Subject "Enviro Impact Statement for the Sale of Plum Island"



Hello Mr. Youngberg,

The Delaware Nation has received correspondence regarding the Environmental Impact Statement for the Sale of Plum Island, Orient Point, New York. The Cultural Preservation Director, Ms. Tamara Francis has reviewed the packet provided to us from GSA and has determined that this is in the Delaware Nation's area of interest. The Lenape people were aboriginal to this area in New York.

The Delaware Nation will be a consulting party on this project and we look forward to hearing back from you regarding the project.

Thank you again for consulting with the Delaware Nation,

Jason Ross  
Museum/Section 106 Assistant  
Cultural Preservation Department  
The Delaware Nation  
P.O. Box 825  
Anadarko, OK 73005  
PH# 405) 247-2448  
FAX# 405) 247-8905  
[www.delawarenation.com](http://www.delawarenation.com)



1250 Seawood Drive

Southold, NY 11971

April 26, 2010

Phil Young

C/O John Dugan, General Services Administration

10 Causeway St., Room 925

Boston, MA 02222

Dear Mr. Young,

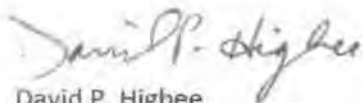
I am a resident of Southold and as such am very much interested in the eventual shutting down of the animal disease laboratory located on Plum Island and the subsequent environmental clean-up. I understand that hearings will occur in Southold sometime in the near future regarding these matters, and I would like to know when the hearings are scheduled for.

Over the years, one aspect of having the facility on Plum Island within the town of Southold has been the rumors circulating in local communities about the true nature of the work being done on the island, whether the facility is truly secure in terms of keeping intruders off the island, and what the nature of the environmental clean-up will really be cleaning up (that is, the idea that the island has been polluted with all sorts of disease-bearing substances and so on). I would suggest that the Department of Homeland Security and the GSA be prepared to address these issues in your presentation at the Southold hearings as a means of deflating these rumors. I think this approach would help in assuring local folks that everything will be handled efficiently in the shutting down of the facility.

As to what eventually happens with the island, I would guess that local sentiment is pretty much against the government selling the island to developers of any sort. One idea is to use the island, at least the eastern side of it, for a wind farm to produce energy. The government could, in this scenario, maintain ownership of the island and lease the land out to wind energy companies.

Thanks for accepting my comments. I'll be looking for notice of the hearings.

Sincerely,

A handwritten signature in dark ink, appearing to read "David P. Higbee". The signature is fluid and cursive, with the first name "David" and last name "Higbee" clearly distinguishable.

David P. Higbee

# New York State Department of Environmental Conservation

## Division of Environmental Permits, Region 1

SUNY @ Stony Brook

50 Circle Road, Stony Brook, NY 11790-3409

Phone: (631) 444-0403 • Fax: (631) 444-0360

Website: [www.dec.ny.gov](http://www.dec.ny.gov)



Alexander B. Grannis  
Commissioner

April 30, 2010

Phil Yougberg, Environmental Manager  
c/o John Dugan  
US General Services Administration (GSA)  
10 Causeway Street, Room 925  
Boston, MA 02222

**RE: Response to your Request for Information for the Environmental Impact Statement  
for the Sale of Plum Island, Orient Point, New York**

Dear Mr. Youngberg:

Thank you for offering the Department of Environmental Conservation (DEC) the opportunity to provide input early in the National Environmental Policy Act (NEPA) process on potential impacts of the proposed sale of Plum Island. DEC has numerous regulatory and resource management authorities, responsibilities and interests on Plum Island which directly affect both the current use and any future uses. This letter will identify the various DEC programs with involvement on the island, and where possible, describe any particular concerns associated with the redevelopment. It will also outline any outstanding or unresolved issues related to the current animal disease research center use which must be resolved before the existing facility is closed and the property is sold. Please note that our comments, particularly on future uses and their impacts, should be considered preliminary as no specific redevelopment proposals or alternatives have been presented to date. For this reason, and the fact that New York State has been delegated the authority to administer several federal environmental regulatory programs directly involved with the current and future activities on the island, we request to participate in the development of the scope of issues for the environmental impact statement (EIS).

### Environmental Quality Programs

Most of DEC's Environmental Quality divisions (Division of Solid & Hazardous Materials, Division of Water, Division of Air Resources, Division of Environmental Remediation) regulate aspects of the existing operation at Plum Island, as well as the existing facility's closure and, depending on the specific proposals put forth for redevelopment, may be involved with the future uses of the island.

1. DEC's Division of Solid and Hazardous Materials, has been closely involved in the Regulated Medical Waste (RMW) permitting of the exit autoclaves, the proposed RMW permitting of Building 102 (Wastewater Biological Decontamination) and Building 101 (RMW Incinerators); the closure of multiple buildings on Plum Island under the Resource Conservation and Recovery Act (RCRA); and the current regulatory oversight under RMW and RCRA regulations.

Our Division of Environmental Remediation has been involved with the investigation of specific sites on the island suspected of containing regulated wastes, which identified Waste Management Areas (WMAs) and Areas of Potential Concern (AOPCs). The following WMAs and AOPCs which were known to have contained treated RMW were excavated, with a report generated in December 2007:

WMA 1  
WMA 10/11\*  
WMA 13  
AOPC 10\*  
AOPC 13  
AOPC 6  
WMA 6  
WMA4/AOPC 11

\*The following comments are excerpted from the referenced report:

WMA10/11: This area, known as Stony Fields, includes stone and gravel with some 10% RMW which could not be segregated. It was mentioned it would be prudent to install one or more monitoring wells between the site and PIADC's two existing well fields. These wells would serve to ensure that the stony waste repository or the low levels of residual contamination observed in the former landfill soils do not lead to future groundwater contamination. The wells could be sampled annually to ensure protection of the island's sole source potable aquifer.

AOPC 10: Low-level PCB exceedance observed in one 1999 groundwater sample might warrant consideration of a targeted sampling initiative to determine with certainty whether this compound is present in this environmental media. It is not known whether this target sampling was conducted.

The EIS for the sale of Plum Island must evaluate these potential sources of contamination, describe any necessary remediation measures, and examine how potential adverse impacts from future disturbance should best be mitigated.

2. Any landfills existing on the island which have not been completely remediated must be surveyed and a deed restriction placed on these locations.
3. There were outstanding issues with regard to groundwater during the RCRA closure. The closure certification addressed specific buildings, but did not include the groundwater. This issue must be addressed island-wide.
4. Permits issued to the facility include closure requirements for the specific areas under the permit. All closure activities must be completed prior to closure/transfer of the island.
5. Building 257: A draft closure plan for the Building 257 and incinerator was provided in January 1996. To date, this building has not undergone any closure activities. All closure activities must be completed prior to closure/transfer of the island.

The Plum Island facility maintains a current, valid Major Oil Storage Facility License. This oil storage facility will have to be closed and properly decommissioned in conformance with all applicable regulations before the island is sold and redeveloped. It should also be noted that there is an on-going groundwater remediation project underway behind Building 101 associated with a fuel oil spill reported in 1995 and some other past fuel oil spills. While the petroleum product recovery continues, the effectiveness of the current remediation system has begun to decline significantly. The operator recently completed a supplemental subsurface investigation to determine an alternative remediation method to complete the clean up. This remedial action will have to be completed to DEC's satisfaction before the area can be redeveloped.

The island's wastewater treatment plant is regulated by DEC pursuant to the State Pollutant Discharge Elimination System (SPDES) program. In order to be in compliance with the plant's SPDES permit and associated regulations, the current and future owner of the island must ensure that an appropriately trained and certified operator is present at the facility at all times, including during and after the sale of the island. Operation of the wastewater treatment plant may be suspended, and the plant placed in inactive service status, if the owner first requests and obtains the required approval from the Department.

Please also be advised that NYSDEC has established a policy which provides instructions to staff for reviewing an environmental impact statement when it includes a discussion of energy use or greenhouse gas (GHG) emissions. The policy provides guidance as to methods to assess and mitigate the impacts of energy use or GHG emissions when reviewing an EIS. Please see the attached web link to the DEC Policy and contact information for staff in NYSDEC's Central Office who can provide additional information on this issue.

#### Natural Resource Programs

Depending upon the location and type of projects proposed, the future redevelopment of the island can also be expected to fall under several additional Department jurisdictions, including Articles 24 and 25 of New York State's Environmental Conservation Law, known as the Freshwater Wetlands Act and the Tidal Wetlands Act, respectively. As such, any regulated activities proposed within the jurisdiction of these laws would be subject to the development restrictions and standards of permit issuance provided in the implementing regulations, 6 NYCRR Part 663.5 (Freshwater Wetlands) and 6 NYCRR Part 661.6 (Tidal Wetlands).

Accordingly, the scope of issues for the EIS should require an analysis of the impacts of the full potential build-out of the island under existing Town of Southold zoning on the following resources or areas of concern:

- Significant fish and wildlife habitats on and in the vicinity of Plum Island, including federal and state designated Coastal Significant Fish & Wildlife Habitats and Natural Heritage Program-listed habitat assemblages (see below), endangered / threatened / special concern species of animals or plants, all wetland areas (tidal and freshwater), important bird habitat, essential fish habitat, submerged aquatic vegetation. Please see the attached web links to the applicable Significant Coastal Fish and Wildlife Habitat Descriptions, and an excerpt from the New York Natural Heritage

Program's description of the maritime dune community which exists in the southeastern portion of the island. Particular attention should be paid to the identification of activities likely to cause adverse resource impacts contained therein. A map of Plum Island showing the locations of significant eel grass beds known to DEC is also attached for your information.

- Any EIS prepared for the transfer and/or redevelopment of Plum Island must demonstrate that the proposed action is consistent with New York State's Coastal Policies as detailed and refined in the Town of Southold's approved Local Waterfront Revitalization Plan (LWRP).
- An analysis of water-quality-related issues associated with the redevelopment. For example, discharge of pollutants, excess nutrient discharge, increases in impervious surface coverage, capacity to manage and treat stormwater runoff, sewage treatment capacity and handling options. The effects of possible surface-water-quality-related changes and their effects on shellfish beds, eel grass beds, native fishery resources and aquaculture. This should also include the identification and analysis of impacts to groundwater and the aquifer.
- An analysis of transportation-related infrastructure and use, including needed marina facilities, private docks, ferry facilities, bridge/s and the use of cars and ferries. Identify and discuss the impacts to natural resources from the construction of the identified transportation infrastructure as well as its use. Examples: dredging associated with new or expanded marina or ferry facilities, the construction of a bridge/s and the related impacts of increased automobile use on the island (air pollution, petroleum pollution, etc.).
- Identify and analyze use conflicts which may develop as a result of the redevelopment. What effects will new or expanded ferry routes have on the existing uses of the area surrounding Plum Island, such as commercial and recreational fishing, wild fish resources, shellfish resources and aquaculture? Plum Gut, The Race and nearby waters are prized as recreational fishing areas. How would the development of more transportation infrastructure or new energy infrastructure (underwater cables, generation turbines, etc.) affect the traditional uses of the waters around the island?
- What will be the natural resource impacts from energy-related infrastructure, such as underwater cables, turbines, or wind mills? How will the demand for energy from the new development be met?
- How will the impacts of sea level rise be addressed in redevelopment plans?
- Describe and analyze how the closure and presumed dismantling of the current research laboratory use will impact the natural resources of the island and surrounding waters identified above.
- Identify and discuss a range of reuse alternatives which includes: the sale or other transfer of ownership of the island to another public entity or land preservation organization for conservation purposes, the establishment of deeded easements over portions of the island to protect important natural resources, and the no action alternative.



The following additional specific Issues of concern have also been identified by our staff:

- The following species, which are listed as threatened or endangered by New York State, have been documented to occur on Plum Island. Any proposed redevelopment of Plum Island must evaluate potential adverse impacts to these species:

Northern Harrier (*Circus cyaneus*)- listed as NYS Threatened –Plum Island is a probable breeding site.

Piping Plover (*Charadrius melodus*)- listed as NYS Endangered and US Endangered/Threatened - Plum Island is a probable breeding site.

- Plum Island is an historical breeding site for the Great Egret (*Ardea albus*) and Snowy Egret (*Egretta thula*), both protected species in New York State.
- There are a number of NYS regulated freshwater wetlands on the island (FWW#'s PL-1, 2, 4, 5, 6, 7 & 8). Any proposed redevelopment of Plum Island must evaluate potential adverse impacts to these wetlands.
- The existing sanitary treatment lagoon for the lab overflows into regulated freshwater wetlands. The EIS for the sale of Plum Island should indicate whether this lagoon will be utilized in future development, and if the lagoon will not be utilized, the EIS should describe how the site will be remediated.

It should also be noted that an area of archeological sensitivity has been identified in the central portion of Plum Island. Under Section 106 of the National Historic Preservation Act and Section 14.09 of the New York State Historic Preservation Act, the State Historic Preservation Office (SHPO) is tasked with ensuring that effects or impacts on archeological sites are considered and avoidance or mitigation measures are developed during the project planning process. Any proposed redevelopment of Plum Island will likely necessitate review by the staff of the SHPO Archeology Unit to determine whether or not the project site falls within a known area of archeological sensitivity. If development is proposed within an area of archeological sensitivity, the project must be further evaluated to determine the extent of any potential impact(s), and to identify measures to be taken to avoid or mitigate such impacts.

Thank you for soliciting our comments on the development of the scope for the DEIS. If I can be of further assistance, please feel free to contact me at 631-444-0403 or [slaicher@gw.dec.state.ny.us](mailto:slaicher@gw.dec.state.ny.us).

Very truly yours,

Sherri Aicher  
Environmental Analyst

Link to DEC Policy on the Review of an EIS with Respect to Energy Use and Greenhouse Gas Emissions:

[http://www.dec.ny.gov/docs/administration\\_pdf/eisghgpolicy.pdf](http://www.dec.ny.gov/docs/administration_pdf/eisghgpolicy.pdf)

NYSDEC's Central Office contacts for technical assistance on the assessment of GHG's in the EIS process:

**Division of Air**

Mark Lanzaframe

Environmental Engineer I

Division of Air Resources

Phone: 518-402-8403

[mrlanzaf@gw.dec.state.ny.us](mailto:mrlanzaf@gw.dec.state.ny.us)

**Office of Climate Change**

John Marschlok

Environmental Engineer II

Office of Climate Change

Phone: 518-402-8448

[jxmarsch@gw.dec.state.ny.us](mailto:jxmarsch@gw.dec.state.ny.us)

Links to the Significant Coastal Fish & Wildlife Habitat Descriptions for Plum Gut and The Race:

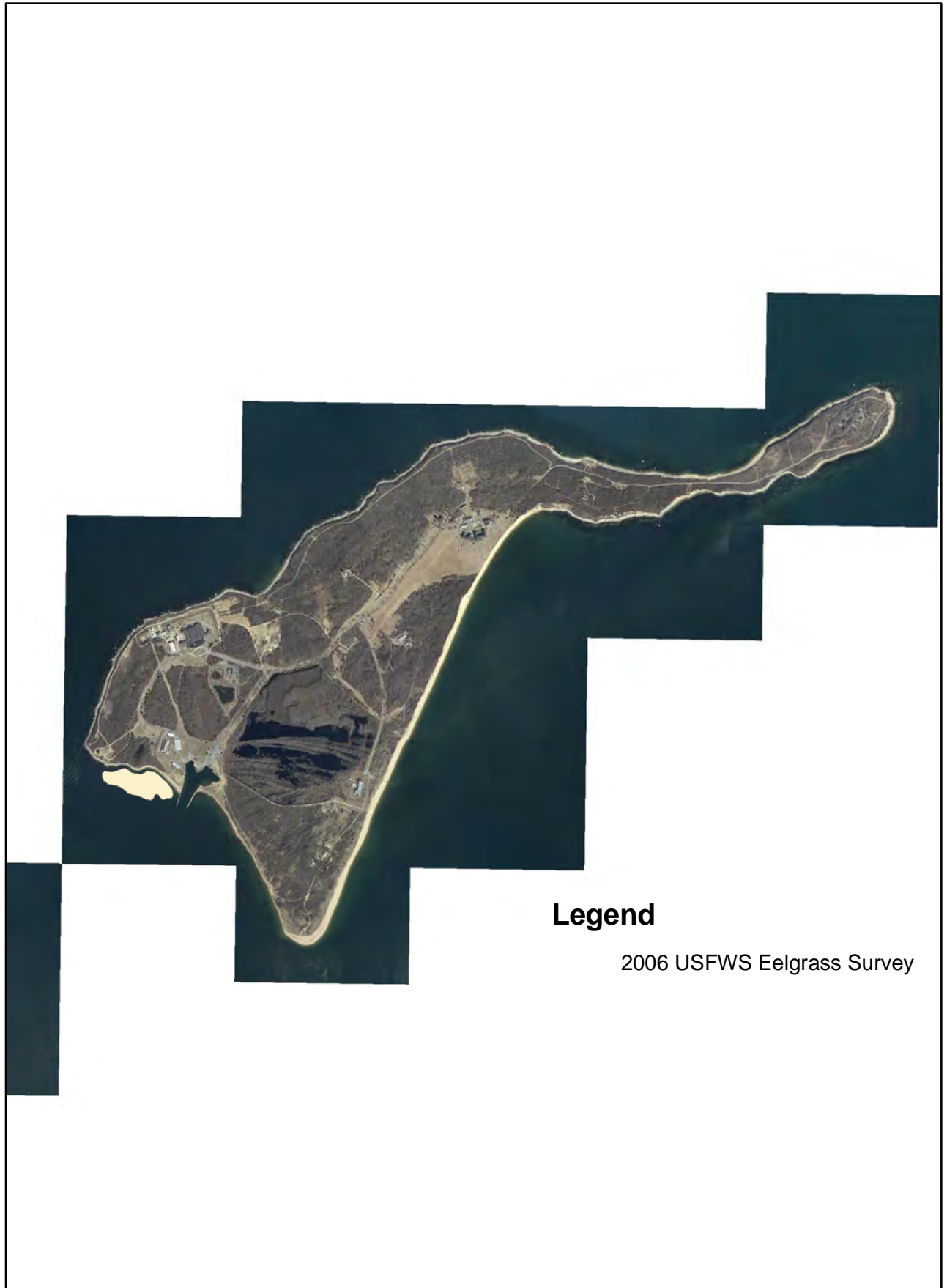
[http://nyswaterfronts.com/downloads/pdfs/sig\\_hab/LongIsland/Plum\\_Gut.pdf](http://nyswaterfronts.com/downloads/pdfs/sig_hab/LongIsland/Plum_Gut.pdf)

[http://nyswaterfronts.com/downloads/pdfs/sig\\_hab/LongIsland/The\\_Race.pdf](http://nyswaterfronts.com/downloads/pdfs/sig_hab/LongIsland/The_Race.pdf)

New York Natural Heritage Program Habitat Description of Plum Island Maritime Dune Community

The maritime dune community is located at the southeastern end of the island. This dune community is fairly large, in good condition, disturbed by old roads, and mostly encircled by roads. According to the New York Heritage Program, "Any development effort that disrupts connectivity between the open ocean and the maritime dune system should be avoided (e.g., a road running parallel to the beach between the beach and dunes). This community is best protected as part of a large beach, dune, salt marsh complex. Development should avoid fragmentation of such systems to allow dynamic ecological processes (overwash, erosion, and migration) to continue. Connectivity to brackish and freshwater tidal communities, upland beaches and dunes, and to shallow offshore communities should be maintained. Connectivity between these habitats is important not only for nutrient flow and seed dispersal, but also for animals that move between them seasonally. Similarly, fragmentation of linear dune systems should be avoided. Bisecting trails, roads, and developments allow exotic species to invade, potentially increase 'edge species' (such as raccoons, skunks, and foxes), and disrupt physical dune processes." Thus, any proposal to redevelop Plum Island must evaluate potential adverse impacts to the maritime dune community.





## Legend

2006 USFWS Eelgrass Survey



## New York State Office of Parks, Recreation and Historic Preservation

Historic Preservation Field Services • Peebles Island, PO Box 189, Waterford, New York 12188-0189

518-237-8643

www.nysparks.com

David Paterson  
Governor

Carol Ash  
Commissioner

May 6, 2010

Mr. Phil Youngberg, Environmental Manager  
c/o Mr. John Dugan  
General Services Administration (GSA)  
10 Causeway Street, Room 925  
Boston, MA 02222

Re: GSA  
Sale of Plum Island  
Orient Point, Suffolk County  
10PR02105

Dear Mr. Youngberg:

Thank you for requesting the comments of the State Historic Preservation Office (SHPO) regarding the proposed sale of Plum Island. We are reviewing the project in accordance with Section 106 of the National Historic Preservation Act of 1966. These comments are those of the SHPO and relate only to Historic/Cultural resources. They do not include potential environmental impacts to New York State Parkland that may be involved in or near your project. Such impacts must be considered as part of the environmental review of the project pursuant to the National Environmental Policy Act and/or the State Environmental Quality Review Act (New York Environmental Conservation Law Article 8).

We offer the following comments:

1. The Light Station on Plum Island is listed in the New York State Register of Historic Places. Using both the Historic Structure Report for the Plum Island Light Station and the Historic Preservation Plan for Plum Island, New York, prepared by FPM/GAI in 2003, we understand there are a number of other structures which are eligible for listing in the registers:
  - a. Plum Island Lighthouse Complex
  - b. Batteries Floyd and Eldridge, Battery Construction No. 217
  - c. Shelter Searchlights 13 and 14
2. Based on our review of previously submitted material, it does not appear that the potential for significant archaeological deposits to be present on Plum Island has been addressed. Please contact Douglas Mackey at extension 3291 if you have any questions regarding this issue.



3. Therefore, SHPO recommends that any action to remove Plum Island from Federal ownership should include covenant or other language mandating consultation with the SHPO regarding possible effects to historic and cultural resources as well as to archaeological deposits for any future ground disturbing activities.

We understand there is a public meeting scheduled in the near future as a member of the SHPO staff should be present. Please contact me at 518-237-8643 (ext 3287) or by email at [elizabeth.martin@oprhp.state.ny.us](mailto:elizabeth.martin@oprhp.state.ny.us) should you have any questions. Refer to the project (PR) number above when corresponding about the project.

Sincerely,

A handwritten signature in cursive script, appearing to read "Elizabeth Martin".

Elizabeth Martin  
Historic Sites Restoration Coordinator

Via email only

## Bourdeau, Jonathan

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**From:** phil.youngberg@gsa.gov  
**Sent:** Friday, May 07, 2010 12:18 PM  
**To:** Sherri Aicher  
**Cc:** Stelmack, Mark; Jenkins, Josh; John Dugan  
**Subject:** Re: Response to Request for Information on EIS for Sale of Plum island, Orient Point, NY

Sherri

The public meetings on May 19 and 20 are to gather information from the community before we prepare a Draft EIS for public release and comment. We don't plan to circulate anything before these meetings. I just called you and left you a voice mail so feel free to call me if you need more information.

Phil Youngberg

----- Original Message -----

From: "Sherri Aicher" [slaicher@gw.dec.state.ny.us]  
Sent: 05/07/2010 11:05 AM AST  
To: Philip Youngberg  
Subject: Re: Response to Request for Information on EIS for Sale of Plum island, Orient Point, NY

Dear Mr. Youngberg,

Can you tell me if you plan to circulate a draft scope before the public scoping meeting on May 20th? And in any case, could you please send me a copy of the draft scope when it's available?

Thanks!

Sherri Aicher  
Environmental Analyst  
NYS DEC Region 1  
SUNY@ Stony Brook  
50 Circle Road  
Stony Brook, New York 11790-3409  
email- [slaicher@gw.dec.state.ny.us](mailto:slaicher@gw.dec.state.ny.us)  
phone: 631-444-0403  
fax: 631-444-0360

>>> <[phil.youngberg@gsa.gov](mailto:phil.youngberg@gsa.gov)> 4/30/2010 2:30 PM >>>

Thank for your comments and we will review your attachments and respond in the DEIS.

----- Original Message -----

From: "Sherri Aicher" [slaicher@gw.dec.state.ny.us]  
Sent: 04/30/2010 02:11 PM AST  
To: Philip Youngberg  
Cc: "Peter Scully" <pascully@gw.dec.state.ny.us>  
Subject: Response to Request for Information on EIS for Sale of Plum island, Orient Point, NY

Dear Mr. Youngberg,

Thank you for requesting our input on the development of the environmental impact statement for the sale of Plum Island. I have attached the letter we prepared in response to your request, as well as two attachments which are referenced in the letter. I will also put hard copies into the mail to you today.

If you need any additional information at this time, please let me know.

Sincerely,

Sherri Aicher  
Environmental Analyst  
NYS DEC Region 1  
SUNY@ Stony Brook  
50 Circle Road  
Stony Brook, New York 11790-3409  
email- [slaicher@gw.dec.state.ny.us](mailto:slaicher@gw.dec.state.ny.us)  
phone: 631-444-0403  
fax: 631-444-0360

## Haywood, Paul

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**From:** Stelmack, Mark  
**Sent:** Monday, May 10, 2010 8:52 AM  
**To:** phil.youngberg@gsa.gov  
**Cc:** Bourdeau, Jonathan; John Dugan  
**Subject:** RE: Plum Island Scoping Session Scheduled for 5-20-2010, Greenport, NY

---

**From:** phil.youngberg@gsa.gov [mailto:phil.youngberg@gsa.gov]  
**Sent:** Saturday, May 08, 2010 8:33 PM  
**To:** John Bredemeyer  
**Cc:** Jill Doherty; Bergen, Dave; Bob Ghosio; LaurenStandish; Jenkins, Josh; Stelmack, Mark; John Kelly; John Dugan  
**Subject:** Re: Plum Island Scoping Session Scheduled for 5-20-2010, Greenport, NY

Mr. Bredemeyer

Thank you for your email and we welcome your comments either as an individual or as a Trustee for the town of Southold. You can submit comments before the public meetings, at the meeting, or after. The town of Southold has already committed to be a cooperating partner to this process. If you submit your written comments to me via email I will make sure they are entered into the record at the meeting in Southold on May 20. You can also speak at the meeting if you choose. Or you can fax or mail comments but I think email is more efficient and quicker. Our process will be open and inclusive. I will also check the status of the website which has just been activated and will be regularly updated. Thank you.

Phil Youngberg.

---

**From:** John Bredemeyer [jbme4u@gmail.com]  
**Sent:** 05/08/2010 05:41 PM AST  
**To:** John Dugan; Philip Youngberg  
**Cc:** Jill Doherty <jilld927@optonline.net>; "Bergen, Dave" <bergend@sunysuffolk.edu>; Bob Ghosio <bob@burts.com>; LaurenStandish <Lauren.Standish@town.southold.ny.us>  
**Subject:** Plum Island Scoping Session Scheduled for 5-20-2010, Greenport, NY

Gentlemen,

I tried the [www.plumislandny.com](http://www.plumislandny.com) website but it only loaded a page offering me to register the website of that name.

I am a near life-long resident of Orient, N.Y. and elected Trustee for the Town of Southold, N.Y.. I would like to be able to submit written comments/questions for the upcoming scoping session in my individual capacity as a Southold Trustee from Orient; there is also a possibility that the Southold Board of Trustees on which I serve may wish to participate as a group. Is there an open written comment period in which I, or other Trustees, or the Board of Trustees may comment before or after the presently scheduled scoping sessions of 5-19-10 in Old Saybrook, Conn. and 5-20-10 in Greenport, N.Y.?

Thank you for your assistance in this matter,

Sincerely,

Southold Town Trustee,  
John Bredemeyer



## Haywood, Paul

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**From:** Stelmack, Mark  
**Sent:** Tuesday, May 11, 2010 11:52 AM  
**To:** Bourdeau, Jonathan  
**Subject:** FW: sale of Plum Island

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**From:** phil.youngberg@gsa.gov [mailto:phil.youngberg@gsa.gov]  
**Sent:** Tuesday, May 11, 2010 11:27 AM  
**To:** Mitzyq  
**Cc:** John Dugan; Jenkins, Josh; Stelmack, Mark  
**Subject:** Re: sale of Plum Island

Mitzyq

The web site below will be periodically updated. The plan is to sell the Island via Public Sale after all the Due Diligence has been completed. Thank you for your interest.

[www.plumislandny.com](http://www.plumislandny.com)

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**From:** Mitzyq  
**Sent:** 05/10/2010 07:09 PM EDT  
**To:** Philip Youngberg  
**Cc:** John Dugan  
**Subject:** sale of Plum Island

Dear Mr. Youngberg:

I read in the New Haven Register on Sunday, May 9, 2010, that Plum Island is going to be put up for sale. Is this really a fact? Who in the world would buy it? Could you please take a minute to explain? I'm very confused and curious and also a bit frightened.

Thank you for your time.

Sincerely,  
Myliisa Quagliano  
[mitzyq@aol.com](mailto:mitzyq@aol.com)  
203-468-8640

## Haywood, Paul

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**From:** Stelmack, Mark  
**Sent:** Tuesday, May 11, 2010 11:52 AM  
**To:** Bourdeau, Jonathan  
**Subject:** FW: PLUM ISLAND SALE

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**From:** phil.youngberg@gsa.gov [mailto:phil.youngberg@gsa.gov]  
**Sent:** Tuesday, May 11, 2010 11:23 AM  
**To:** LINDA STANCO; john.dugan@gsa.gov  
**Cc:** Jenkins, Josh; John Dugan; Stelmack, Mark  
**Subject:** Re: PLUM ISLAND SALE

Thank you for your comments.

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**From:** LINDA STANCO [lmstanco@yahoo.com]  
**Sent:** 05/11/2010 08:17 AM MST  
**To:** Philip Youngberg; John Dugan  
**Subject:** PLUM ISLAND SALE

Please be advised we are strongly in favor of utilizing Plum Island for passive environmental endeavors and possibly some office space where buildings already exist. This land should not be developed but used for public enjoyment.

Lin Stanco

## Haywood, Paul

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**From:** phil.youngberg@gsa.gov  
**Sent:** Wednesday, May 12, 2010 12:03 PM  
**To:** craigsparkman@msn.com  
**Cc:** Jenkins, Josh; john.dugan@gsa.gov; Stelmack, Mark  
**Subject:** Re: Public Scoping Meeting for Plum Island, NY

Mr. Sparkman

We plan to keep this web site populated with the current information on the project. Thanks for your interest in this project.

Phil Youngberg  
404-562-0787 office  
404-433-8393 cell

CHARLES SPARKMAN <[craigsparkman@msn.com](mailto:craigsparkman@msn.com)>  
05/12/2010 11:55 AM

To <[phil.youngberg@gsa.gov](mailto:phil.youngberg@gsa.gov)>  
cc  
Subject Public Scoping Meeting for Plum Island, NY

Mr. Youngberg,

Ref: Your May 3, 2010 eMail, "Public Scoping Meeting - Plum Island, NY"

Will you post the GSA and DHS briefings from your scoping meetings on the <http://plumislandny.com/> website? This may be the only way individuals can view your information and contribute to your EIS preparation if they are unable to attend your meeting next week.

Thank You,

Craig Sparkman

## Haywood, Paul

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**From:** phil.youngberg@gsa.gov  
**Sent:** Thursday, May 13, 2010 1:19 PM  
**To:** David.R.Adams@morganstanleysmithbarney.com  
**Cc:** john.dugan@gsa.gov; Jenkins, Josh; Stelmack, Mark  
**Subject:** Re: Sale of Plum Island

David

We plan to keep the web site below populated with the latest information. Thanks for your inquiry.

[www.plumislandny.com](http://www.plumislandny.com)

Phil Youngberg  
404-562-0787 office  
404-433-8393 cell

"Adams, David"  
<[David.R.Adams@morganstanleysmithbarney.com](mailto:David.R.Adams@morganstanleysmithbarney.com)>

To <[phil.youngberg@gsa.gov](mailto:phil.youngberg@gsa.gov)>  
cc  
Subject Sale of Plum Island

05/13/2010 08:53 AM

Dear Sir. Having read the public notice in my local newspaper, would you happen to have any other material on the possible sale of Plum Island? A summary or article would be great. Thanks, Dave Adams

---

### Important Notice to Recipients:

It is important that you do not use e-mail to request, authorize or effect the purchase or sale of any security or commodity, to send fund transfer instructions, or to effect any other transactions. Any such request, orders, or instructions that you send will not be accepted and will not be processed by Morgan Stanley Smith Barney.

The sender of this e-mail is an employee of Morgan Stanley Smith Barney LLC. If you have received this communication in error, please destroy all electronic and paper copies and notify the sender immediately. Erroneous transmission is not intended to waive confidentiality or privilege. Morgan Stanley Smith Barney reserves the right, to the extent permitted under applicable law, to monitor electronic communications. By e-mailing with Morgan Stanley Smith Barney you consent to the foregoing.

# DOMINICK S. TRINGALI

Funds, Bonds, Life, Hospital, Disability,  
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34 DOHERTY AVENUE • ELMONT, N. Y. 11003

FL 2-2578

May 15, 2010

Phil Youngberg, c/o John Dugan  
Environmental Manager  
Public Building Service  
U.S. General Services Administration  
10 Causeway Street, Room 925  
Boston, MA 0222

Gentlemen:

Thankyou, for your letter of May 3, 2010, on the preparation of an Environmental Impact Statement/report, re: Plum Island, NY and an ancillary support facility in Orient Point, NY. I normally will be happy to issue my investigation report of findings. I won't because it will end up in a waste paper basket. Althouth, all of my reports are factual, backed up my published information, witnesses and, details easily checked.

Since 1978, I have not received any responses for my letters, or faxed reports. Thus, I spent much valuable time and money uselessly. It seems as if I were going up against "Gag Orders". Plus, I am retired at below poverty level income. Yet, my reports are as always, COMPLIMENTARY. You may respond and ask for my reported findings but, on condition I respond with my report to be used as if I were a whistle-blower, to receive the 30% whistleblower's reward on arrest and conviction (I otherwise get nothing).

As an example as to how my reports are factual: The Casa-Care Case "Restitution was \$1.25 Million Dollars" for which I received no compensation and I had to absorb all of my costs. This was one of over fifty cases I worked on. I contributed to winning each case.

I am sitting on many terrorists' operations reports, many contributing to environmental pollution which "have never been reported to any health organization, nor news media. Each effected by a GAG ORDER."

Please do check on my disability which resulted in my blowing my cover. I was injured in or about 1978. I was to also be blinded by sulfuric acid. As I suspected my cover had been blown I asked my co-worker to show me how he wanted me to add water to a storage battery. Like a fool, he bent over to add water to the storage battery "which spit/splashed sulfuric acid into his eyes and face (medical records will prove this).

I have been sitting on a laundry list of environmental accidents as happened and waiting to happen, since around 1950's, all reported and all ignored. The reason I call them terrorist acts. I wouldn't be surprised if BIG, BIG, BIG, BIG MONEY weren't involved as to pay for terrorists' acts, under the table. Plum Island does contribute to widespread pollution. Sincerely,

*Dominick S. Tringali, Jr.*  
Tomorrow... "Better Be Safe Than Sorry"



PS. As this letter states "I worked undercover on many cases without drawing any suspicion until 1978". Most cases were those I had suspected of contributing widespreading social problems, many involving the NYS Insurance Dept (I was both an insurance Agent, and an Insurance Broker). I purposely never applied for licenses so that I would face dumb company executives only and no lawyers, the reason I was 100% successful.

Jobs: To work undercover I had to obtain employment. I did this to perfection. It was difficult at first but gradually I was hired on first try, even by Engineering Companies. Example: LIRR, Republic Aviation Corp, Fred Goat Engineering Co., Port of NYS Authority, to name some. "In each case, I was hired although I wasn't needed". Republic Aviation Corp. placed me into their Experimental Aircraft Dept where I worked for years. In all cases I never used nor had any referral, but hired cold-turkey, again they didn't need me. "No one helped me get hired at anytime". Even American Boasch ARMA hired me to work hand and hand with their Engineers (to my surprise).

Why did I get jobs so easily? Does it mean jobs are available? Does it mean anyone may be hired if they follow my system of getting hired. The answer is yes, there really is no jobs shortage, there never has been any jobs shortage (MY OPINION BASED ON FACT). I focused on there being no jobs shortages using my youngest son Paul. Paul had just given up on his job search for the day. I asked if I could try to help him to help himself. He restated he did everything he could that day. I asked him again to which he hopelessly agreed for my help. I simply gave him three places he should try phoning the next morning, in the order given him. He phoned, he was asked to come down to be interviewed and several hours late he came home with the good news of his having been hired. This is all I will tell, for now.

Jobs: Again, is there really a job shortage? Answer is NO and, that there is never a jobs shortage. I have proven this time and again, each time people supposingly interested in a job "changed the conversation". I didn't give my son Paul a chance to change the conversation. "Yes, Employers always want to hire, hire, hire and hire as it is the only way for them to expand their business activities. Yes, there is more: Not only is there no jobs shortage "the need to hire is unlimited". Are there companies wanting to hire? Yes, for any number of reasons besides wanting to expand their operations. Could all of these potential employers be reached? No. Why, I won't tell until my std of living improves. I call it bartering.

# New York Institute of Criminology

2109 Broadway New York City

Licensed by the State of New York

This certifies that

DOMINICK S. TRINGALI



has satisfactorily completed the course of training in

→ Techniques of Detection and Investigation  
and is awarded this

## Certificate of Graduation

In witness whereof this Certificate bears the seal  
of the Institute and the signatures of the Dean

Dated at New York, N. Y., this 8th day of June  
Nineteen Hundred and Fifty ONE.

  
*Michael J. Luca*  
Director

*James E. [Signature]*

## Haywood, Paul

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**From:** phil.youngberg@gsa.gov  
**Sent:** Tuesday, May 18, 2010 8:41 PM  
**To:** john george  
**Cc:** John Dugan; Jenkins, Josh; Stelmack, Mark  
**Subject:** Re: Plum Island

All proceedings will be published in the Draft EIS for 45 days of public comment. The website will also periodically be updated. You can call me next Monday or Tuesday and I can fill you in. I am on vacation starting Wed for 10 days. My cell is 404 433 8393. Phil Youngberg

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**From:** john george [jggspacelaw@hotmail.com]  
**Sent:** 05/18/2010 01:00 PM MST  
**To:** Philip Youngberg; John Dugan  
**Subject:** Plum Island

Mr. Youngberg and/or Mr. Dugan,

My name is John George. I am writing because I am interested in the possible future use of Plum Island. Unfortunately, I am presently in North Dakota awaiting review for acceptance into the Illinois Bar, and cannot attend either of the scoping meetings scheduled for May 19th and 20th. Will it be possible to access the information presented at these meetings without the benefit of being present or having a representative there? If so, how can I get the information from the proceedings? Also, can I impose upon either or both of you with a phone call sometime at the end of this week or the beginning of next week to solicit a few questions regarding this process?

With gratitude and respect,

John George

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The New Busy is not the too busy. Combine all your e-mail accounts with Hotmail. [Get busy.](#)

## Haywood, Paul

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**From:** phil.youngberg@gsa.gov  
**Sent:** Wednesday, May 19, 2010 5:41 PM  
**To:** Gary Garren  
**Cc:** john.dugan@gsa.gov; Jenkins, Josh; Stelmack, Mark  
**Subject:** Re:

Gary  
Thanks for your comment.  
Phil Youngberg.

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**From:** Gary Garren [slcca25@sbcglobal.net]  
**Sent:** 05/19/2010 02:32 PM MST  
**To:** Philip Youngberg  
**Cc:** John Dugan

Dear Mr Youngberg,

My name is Gary Garren, I currently live in the San Francisco Bay Area. I receive the Suffolk Times regularly, as I grew up on the east end of Long Island and like to keep informed. I've been following the articles posted to the Times concerning the disposition of Plum Island with great interest.

As a child, I spent several years living on PI. It was in the early to mid fifties when the USDA took over operation of the island for the purpose of animal disease research. As I remember those days living there, it was a truly magical place hardly touched or trampled by human development. The vegetation, wildlife, the beaches were pristine and the remains of old Fort Terry was an historical bonanza. I sincerely believe that the best outcome for this island is to keep it in government hands and not allow unfettered public access. Keep it as a preserve.

Sincerely,  
Gary Garren

GSA

## Plum Island EIS Comment Card

**We welcome your input!**



If you would like to provide a written comment on the sale of Plum Island, New York, please use this card.

Please PRINT your name below. Your address is not required. However, if you would like to be added to the mailing list please PRINT your address.

MRS.

MS.

MR.

CHARLES HALBING JR

(First Name)

(Last Name)

58 COLLEGE ST. OLD SAYBROOK, CT 06475

Address

City

State

Zip Code

E-mail address

**Comment:** I SUGGEST THAT THE PROPERTY AT PLUM ISLAND, NY BE TRANSFERRED TO THE NATIONAL PARK SERVICE FOR THE DEVELOPMENT AS A NATIONAL PARK FOR THE FOLLOWING REASONS:

Over

1- CONSERVATION AND WILD LIFE ISSUES WOULD BE ADDRESSED-



## Comments continued

**Privacy Advisory:** As the General Services Administration (GSA) undertakes the preparation of an Environmental Impact Statement (EIS) on the sale of Plum Island, New York, we invite you to participate. Your information in identifying important issues that need to be studied will assist the GSA in formulating alternatives and carrying out our responsibilities under the National Environmental Policy Act. Comments, names, and addresses are generally made available for public review although personal home addresses and phone numbers will not be published in the final EIS. **Individuals wishing to have their name, address and phone number withheld from public**

**disclosure to the extent allowed by law, should check this box ☐**

B - HISTORIC BUILDINGS AT FOOT FERRY COULD BE PRESERVED, PERHAPS USED AS LODGING.

C - THE RECENTLY CONSTRUCTED 5000 FT<sup>2</sup> BUILDING WOULD MAKE A WONDERFUL VISITORS / ADMINISTRATIVE CENTER.

D - JOBS WOULD BE MADE TO REPLACE JOBS LOST WHEN PIADC MOVES TO KANSAS IN 2018.

E - THE REMAINDER OF 840 ACRES OF BEACH AND VIEWS WOULD BE LEFT NATURAL FOR ALL TO ENJOY.

F ACCESS IS ALREADY IN PLACE

Charles C. Haley Jr 5-19-11

## Haywood, Paul

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**From:** phil.youngberg@gsa.gov  
**Sent:** Thursday, May 20, 2010 12:08 PM  
**To:** Benson, Judy  
**Cc:** John Dugan; John Kelly; Jenkins, Josh; Stelmack, Mark; dana.bouley@dhs.gov  
**Subject:** Re: information on status of Manhattan, Kansas, facility requested

Judy. I forwarded this to DHS and they should respond soon. Phil

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**From:** "Benson, Judy" [J.Benson@theday.com]  
**Sent:** 05/20/2010 11:37 AM AST  
**To:** Philip Youngberg  
**Subject:** information on status of Manhattan, Kansas, facility requested

Mr. Youngberg:

I attended the GSA's scoping meeting on Plum Island last night and am working on an article for tomorrow's paper about it. In the article, I would like to update the status of the planned new facility in Kansas. Would you please provide information as soon as possible today about how far along the project is, the estimated cost, whether a specific property has been chosen and acquired and related questions. Please call me at (860) 701-4337.

Thank you,

Judy Benson  
Staff writer / Health-Science-Environment Reporter  
The Day  
47 Eugene O'Neill Drive  
New London, CT 06320  
(860) 701-4337  
[j.benson@theday.com](mailto:j.benson@theday.com)  
[www.theday.com](http://www.theday.com)

## Haywood, Paul

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**From:** phil.youngberg@gsa.gov  
**Sent:** Friday, May 21, 2010 12:14 PM  
**To:** Mary (Dream Fairy)  
**Cc:** Jenkins, Josh; Stelmack, Mark; John Dugan  
**Subject:** Re: Plum Island

Thank you for your comments. They will be included in the project record and will be considered.

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**From:** "Mary (Dream Fairy)" [mary.mmschmidt@gmail.com]  
**Sent:** 05/21/2010 05:01 AM CST  
**To:** Philip Youngberg  
**Cc:** Marguerite Strohl <mstrohl@eaglecom.net>  
**Subject:** Plum Island

Hello,

I am a firm believer in that Plum Island and the lab needs to remain just where it is for the public's safety. It is unthinkable to move it to a new lab to be built in Kansas. The diseases that are studied at Plum Island are terrible diseases in which to contract such as Lyme disease and those diseases are better kept away from the public by being on an island and not in the middle of the USA. Some serious thought needs to be given here. A new lab can be built on Plum Island and the diseases can be kept more secure there than in the middle of US.

Thanks,  
Mary Schmidt, RN, BSN